

May 2019

# Trolling for Title X Funds

*How Businesswoman Kathleen Eaton Bravo  
Diverted Federal Funds Designated for  
Family Planning Services to Her  
Empire of Deliberately Misleading Clinics.*

C A M P A I G N F O R

**ACCOUNTABILITY**

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## Executive Summary

When the U.S. Department of Health and Human Services (“HHS”) awarded \$1.7 million to the Obria Group on March 29, 2019, the announcement marked the culmination of a decades-long con, perpetrated by businesswoman Kathleen Eaton Bravo, to divert federal funding from legitimate service providers to her empire of deliberately misleading, fake medical clinics.<sup>1</sup> HHS shocked health experts by agreeing to provide Title X funding to a group that adamantly refuses to provide any form of birth control beyond natural family planning. The purpose of the Title X program, however, is to provide funding for healthcare providers that offer comprehensive family planning services, which includes hormonal birth control.

This incongruity is just one example in a decades-long history of misleading and incorrect assertions from Obria and its alleged founder, Ms. Bravo. CfA’s new report, *Trolling for Title X Funds*, reveals how Obria has, over the course of its history, obtained government funding through a series of bait and switches in order to prop up its fake clinics and pay its leader an astonishingly high salary.

Obria started as a single crisis pregnancy center (“CPC”) in southern California in the 1980s. CPCs are fake medical clinics that target pregnant women and whose so-called counselors try to convince women to forgo their intention to have an abortion. Since 2014, Ms. Bravo has been trying to build Obria, a perversion of the Spanish word for work, *obra*, into a national empire of affiliated CPCs.<sup>2</sup> Today, Obria operates its own network of CPCs and partners with other organizations around the country that also maintain networks of CPCs. Obria has been at the vanguard of CPCs trying to camouflage their religious operations in order to receive federal funding.

Obria’s success parallels the larger rise of CPCs across the country. Following the widespread legalization of abortion in the 1960s and the *Roe v Wade* decision in 1973, anti-choice advocates launched thousands of clinics to trick pregnant women into not having abortions. Ms. Bravo discerned that the prudent way to pay for the cost of operating these clinics was to obtain government funding for alternative programs such as homeless shelters and abstinence education initiatives. Through programs at HHS, the Department of Housing and Urban Development, and the Department of Justice, Obria was able to cobble together government grants to pay for Ms. Bravo’s ever-increasing salary and the overhead costs associated with the CPCs.

Through her connections to the Catholic Church, Ms. Bravo ramped up Obria’s outside fundraising to secure additional funding to expand Obria into a national organization. Obria claims it has 21 clinics and 11 mobile units around the country.<sup>3</sup> Notably, many of these affiliates are questionable entities, including one Georgia clinic, whose activities were so

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<sup>1</sup> <https://obriagroup.org/title-x-announcement/>.

<sup>2</sup> Kate O’Hare, *Kathleen Eaton Bravo Changes Course for Pro-Life BirthChoice*, *CatholicVote*, Nov. 12, 2014, available at <https://www.catholicvote.org/kathleen-eaton-bravo-changes-course-for-pro-life-birthchoice/>.

<sup>3</sup> <https://obriagroup.org/title-x-announcement/>.

controversial that a meeting of the local School Board drew headlines after discussing the CPC's abstinence education program.<sup>4</sup>

Underpinning all of Obria's activities is its pervasive religious ideology. Obria appears to screen job applicants, potential affiliates, and even patients to ensure they are sufficiently Christian. Despite these obvious red flags, the Trump administration has determined Obria is worthy of federal funding for its fake medical clinics.

This report outlines the historical development of CPCs, which created the space for Obria to flourish. The report also details the history of Obria including Ms. Bravo's work to secure government funding and transform Obria into a national organization. Finally, the report details Obria's current structure and future plans to obtain more federal funding and recruit additional affiliates across the country.

### Key Findings

- The organization collectively known as Obria refers to three separate 501(c)(3) organizations: **The Obria Group, Inc.**, the national umbrella organization of affiliate clinics; **Obria Medical Clinics of Southern California, Inc.**, an affiliate network of CPCs; and **Toby's House**, a defunct homeless shelter.<sup>5</sup>
- Obria is run by Kathleen Eaton Bravo, a strident Catholic who has "earned national acclaim for her work creating several faith-based, pro-life ministries."<sup>6</sup> Ms. Bravo has said publicly that she started working at CPCs after she had an abortion in 1980.<sup>7</sup>
- Ms. Bravo has offered many inconsistent explanations regarding the creation and growth of Obria. For instance, Ms. Bravo claims she "founded" Obria, but a different executive director filed Obria's Articles of Incorporation in 1985, and Ms. Bravo first appears on its state filings in 1993. Old versions of Obria's website said it was set up in 1981.
- In 1997, the *Orange County Register* published an op-ed about Obria by Andrew Puzder, who was the chairman of the board at the time. President Trump later nominated Mr. Puzder to be the Secretary of the Department of Labor, but Mr. Puzder withdrew after allegations of domestic violence from the 1980s resurfaced.
- Since 2001, the Obria Group, Obria Medical Clinics of Southern California, and Toby's House have reported total revenue of more than \$32 million on their annual tax filings.

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<sup>4</sup> Eric Sturgus, *Sex Ed Complaints Arise Again, This Time in Gwinnett*, *Atlanta Journal Constitution*, June 21, 2017, available at <https://www.ajc.com/news/local-education/sex-complaints-arise-again-this-time-gwinnett/EMhhYMFFsQ1f6vA0BcZNOO/>.

<sup>5</sup> Unless otherwise noted, this report refers to the current name of each entity when describing their past activity.

<sup>6</sup> Before 2011, she was listed on Obria's tax forms as Kathleen Eaton. Since 2011, she has listed her name as Kathleen Eaton Bravo. CfA's report refers to her as Ms. Bravo throughout.

<sup>7</sup> <https://obriagroup.org/about/>.

- Since 2001, the Obria Group and its related entities have reported receiving nearly \$3 million in local, state, and federal government grants, including a congressional earmark.<sup>8</sup>
- Since 2003, the Obria Group and its related entities have paid Ms. Bravo more than \$1.8 million in salary. In 2013, her annual salary reached its highest amount at \$196,341. In 2016, the most recent year available, her salary was \$168,696. Ms. Bravo also received additional income as the head of her own for-profit, private company.
- In 2007, Toby's House paid three-fourths of its entire budget for the year to one human resources contractor.
- Beginning in 2009, the Orange County Board of Supervisors used a tobacco settlement fund to award hundreds of thousands of dollars to Obria for abstinence education programs, but Obria funneled the money to its CPC, not to its entity explicitly set up to run abstinence education programs.
- The Obria Group has used its funds to pay organizations run by its board members. In 2014, Obria paid \$76,809 to Bravo Builders, a company owned by Ms. Bravo's husband, for remodeling. From 2009 to 2011, Obria paid nearly \$6,000 in legal fees to the Alvarez Law Firm, a law firm run by one of Obria's board members, Justin Alvarez.
- In 2014, the U.S. Conference of Catholic Bishops gave \$750,000 to Obria Medical Clinics of Southern California, or about 25 percent of the total revenue that year.
- In 2014, Obria pledged to recruit 200 clinics within five years. Today, Obria has around 30 affiliate clinics. The exact number of affiliate clinics claimed by Obria has fluctuated in its public materials.
- Obria's smartphone app states that the organization does not provide medical advice: "The Obria Medical Clinic Services are not a substitute for a formal consultation with a medical doctor or other qualified health care provider."
- Obria's affiliate in Georgia operates an abstinence education program that has been the subject of numerous complaints from students.
- Obria's application for 2019 Title X funding in Texas said that Obria's subrecipients would provide a "broad range of family planning methods" including several contraception options, but Obria sent an email to its supporters claiming that "Obria's clinic model is committed to never provide hormonal contraception nor abortions!"
- Obria has been criticized by other CPCs for applying for Title X funding since the program requires recipients to provide contraception and refer patients for abortion. Ms. Bravo said in 2015, "I would close my doors" before providing contraception or abortion referrals.

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<sup>8</sup> This total does not include the recent grant announced by HHS since Obria has not filed its annual tax form for the relevant year.

## Section I: History of Crisis Pregnancy Centers

Beginning in the 1960s, the anti-choice movement established CPCs as a backlash to the widespread legalization of access to abortion.<sup>9</sup> CPCs are small offices that entice pregnant women seeking abortions to enter their doors where so-called counselors try to convince them to forgo the intended procedure.<sup>10</sup> The CPCs often offer some modicum of healthcare services including ultrasounds, pregnancy tests, and sometimes STI testing, but provision of these services is not their primary mission.<sup>11</sup> Many pro-choice advocates, lawmakers, and public officials have concluded that these centers purposefully mislead women in violation of state laws.<sup>12</sup>

Anti-choice advocates claim that the first CPC was set up in Hawaii in 1967 by Robert Pearson, a homebuilder.<sup>13</sup> Birthright, a Toronto-based network of CPCs founded in 1968, claims to be the oldest CPC conglomerate in North America.<sup>14</sup> After the Supreme Court affirmed a woman's right to choose in 1973, the anti-choice movement expanded its efforts to set up more CPCs to divert women away from medical clinics that provide abortion services.<sup>15</sup>

For several decades, CPCs survived by raising funds from religious donors and churches. After setting up the first CPC in Hawaii, Mr. Pearson started the Pearson Foundation in St. Louis to promote CPCs nationally.<sup>16</sup> An early manual published by the foundation instructed centers to lie to women about the true purpose of the CPC.<sup>17</sup> The manual explained that CPCs should employ dual names and separate marketing materials with one brand intended for pregnant

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<sup>9</sup> Jane Gross, *Pregnancy Centers: Anti-Abortion Role Challenged*, *The New York Times*, Jan. 23, 1987, available at <https://www.nytimes.com/1987/01/23/nyregion/pregnancy-centers-anti-abortion-role-challenged.html>.

<sup>10</sup> Mary Tuma, *Crisis Pregnancy Centers: Money for Nothing*, *The Austin Chronicle*, July 20, 2018, available at <https://www.austinchronicle.com/news/2018-07-20/crisis-pregnancy-centers-money-for-nothing/>; *The Truth about Crisis Pregnancy Centers*, NARAL Pro-Choice America, Jan. 1, 2017, available at <https://www.prochoiceamerica.org/wp-content/uploads/2016/12/6.-The-Truth-About-Crisis-Pregnancy-Centers.pdf>.

<sup>11</sup> *Crisis Pregnancy Centers Offer Misleading Information on Abortion Risks*, *Guttmacher Institute*, July 18, 2016, available at <https://www.guttmacher.org/article/2006/07/crisis-pregnancy-centers-offer-misleading-information-abortion-risks>.

<sup>12</sup> Tom Bowman, *Crisis Pregnancy Centers Accused of Misleading Women Seeking Abortion*, *The Baltimore Sun*, July 25, 1991, available at <https://www.baltimoresun.com/news/bs-xpm-1991-07-25-1991206027-story.html>; Joanne D. Rosen, *The Public Health Risks of Crisis Pregnancy Centers*, *Perspectives on Sexual and Reproductive Health*, Sep. 2012, available at <https://www.guttmacher.org/journals/psrh/2012/09/public-health-risks-crisis-pregnancy-centers>; Jane Gross, *Pregnancy Centers: Anti-Abortion Role Challenged*, *The New York Times*, Jan. 23, 1987, available at <https://www.nytimes.com/1987/01/23/nyregion/pregnancy-centers-anti-abortion-role-challenged.html>.

<sup>13</sup> Judith Davidoff, *Pregnant? Scared?*, *Isthmus*, Feb. 1, 2013, available at <https://isthmus.com/news/news/pregnant-scared-abortion-risks-are-exaggerated-at-wisconsins-crisis-pregnancy-centers/>; *Crisis Pregnancy Centers: An Affront to Choice*, *National Abortion Federation*, 2006, available at [http://prochoice.org/wp-content/uploads/cpc\\_report.pdf](http://prochoice.org/wp-content/uploads/cpc_report.pdf); Kathryn Joyce, *Shotgun Adoption*, *The Nation*, Aug. 26, 2009, available at <https://www.thenation.com/article/shotgun-adoption/>.

<sup>14</sup> <https://www.hli.org/resources/crisis-pregnancy-center-movement/>.

<sup>15</sup> Dawn Stacey, *History of Crisis Pregnancy Centers*, *Crisis Pregnancy Center Watch*, available at <https://www.motherjones.com/files/cpchistory2.pdf>.

<sup>16</sup> Jane Gross, *Pregnancy Centers: Anti-Abortion Role Challenged*, *The New York Times*, Jan. 23, 1987, available at <https://www.nytimes.com/1987/01/23/nyregion/pregnancy-centers-anti-abortion-role-challenged.html>.

<sup>17</sup> *Id.*

women and another for religious donors.<sup>18</sup> Several state attorneys general investigated CPCs and found that this dual structure was set up to mislead women and violated consumer protection laws.<sup>19</sup>

By 1985, Birthright claimed a network of more than 600 centers throughout North America.<sup>20</sup> The Save-a-Baby chain of CPCs began operating in 1982, and it reported more than 209 locations just three years later.<sup>21</sup> At the time, Alternatives to Abortion International claimed that there were 1,500 CPCs in operation.<sup>22</sup> The growth of CPCs exploded throughout the decade. In 1989, *Newsday* reported that 4,000 CPCs existed in the United States.<sup>23</sup> Reports indicate that the number of CPCs has continued to hover between 3,000 to 4,000 locations nationwide.<sup>24</sup>

Today, the industry is dominated by a few national players, including Heartbeat International and Care Net, which each claim thousands of affiliates.<sup>25</sup> These centers are religiously based and pay for their operations by raising money from private donors, foundations, and churches.<sup>26</sup> Despite investigations by state officials, CPCs have continued to employ the same misleading tactics they have used for decades.<sup>27</sup> They often locate their centers as close as possible to real medical clinics that provide legitimate healthcare services. They advertise in the same places as abortion clinics, and they use innocuous language to lead pregnant women to believe they also provide abortions.

CPCs have even updated their tactics for the digital age. For instance, they maintain dual websites: a secular site to appeal to pregnant women and a religious one to appeal to their donors and supporters.<sup>28</sup> CPCs have also hired digital advertising firms to push geotargeted ads at

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<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> Clara Germani, Pro-life Groups Open Own Clinics to Offer Alternatives to Abortion, *Christian Science Monitor*, July 18, 1985.

<sup>21</sup> *Id.*

<sup>22</sup> *Id.*

<sup>23</sup> Mark Lowery, Abortion in America. Focus on the City; An Alternative That's Not Always Made Clear, *Newsday*, April 25, 1989.

<sup>24</sup> Crisis Pregnancy Centers: An Affront to Choice, *National Abortion Federation*, 2006, available at [http://prochoice.org/wp-content/uploads/cpc\\_report.pdf](http://prochoice.org/wp-content/uploads/cpc_report.pdf); Garnet Henderson, Anti-Choice Clinics Are Changing the Way They Operate to Qualify for Government Funding, *Tonic*, Jan. 15, 2019, available at [https://tonic.vice.com/en\\_us/article/8xpw8b/crisis-pregnancy-centers-medical-services-government-funding](https://tonic.vice.com/en_us/article/8xpw8b/crisis-pregnancy-centers-medical-services-government-funding).  
<sup>25</sup> <https://www.heartbeatinternational.org/about/our-story>; <https://www.care-net.org/affiliation>.

<sup>26</sup> Joan Shippo, The National Christian Foundation Is a Top Backer of Crisis Pregnancy Centers, *Inside Philanthropy*, Jan. 16, 2015, available at <https://www.insidephilanthropy.com/girls-women-grants-funding/2015/1/16/the-national-christian-foundation-is-a-top-backer-of-crisis.html>; Jim Graves, Fighting the Culture of Death-and Planned Parenthood-in California, *The Catholic World Report*, Jan. 9, 2015, available at <https://www.catholicworldreport.com/2015/01/09/fighting-the-culture-of-death-and-planned-parenthood-in-california/>; 2015 Return of Organization Exempt from Income Tax, Form 990, Obria Medical Clinics of Southern California, May 4, 2017, available at <http://www.guidestar.org/ViewEdoc.aspx?eDocId=4867387&approved=True>.

<sup>27</sup> Jane Gross, Pregnancy Centers: Anti-Abortion Role Challenged, *The New York Times*, Jan. 23, 1987, available at <https://www.nytimes.com/1987/01/23/nyregion/pregnancy-centers-anti-abortion-role-challenged.html>.

<sup>28</sup> Letter from Daniel Stevens, Executive Director of Campaign for Accountability, to Ohio Attorney General Mike DeWine, June 5, 2018, available at <https://campaignforaccountability.org/work/letter-calling-on-ohio-attorney-general-to-investigate-state-funded-fake-abortion-clinics-for-misleading-women/>.

women who enter abortion clinics.<sup>29</sup> The Massachusetts Attorney General concluded that this tactic violates consumer protection laws and forced one advertising firm to forgo this approach in Massachusetts.<sup>30</sup>

### State Funding for CPCs

As CPCs have expanded their footprint, their backers have tried to shift the cost of maintaining these centers to taxpayers. CPCs generally have been ineligible to receive federal funding designated for family planning services since they mostly do not provide the requisite services. CPCs, however, frequently receive public funding through a variety of other avenues.<sup>31</sup> According to the publication *Rewire.News*, 14 states provide direct funding to CPCs, which totaled \$40.5 million in 2018.<sup>32</sup> North Carolina, for instance, has set aside \$1.3 from the Maternal and Child Health Services Block Grant program to fund CPCs.<sup>33</sup> In Pennsylvania, state legislators have appropriated nearly \$7 million annually to a CPC called Real Alternatives.<sup>34</sup> In addition to direct funding, 17 states operate Choose Life license plate programs, which fund CPCs.<sup>35</sup> These states sell anti-choice themed license plates and direct the proceeds from the program to CPCs.

CPCs often provide other services beyond their stated mission in order to obtain state or local funding. In Ohio, for instance, a CPC called Family and Youth Initiatives (“FYI”), received \$77,205.50 in state funding from the Ohio Department of Education for a Community Connectors program, which provides funding to help students find mentors.<sup>36</sup> ServeOhio, the state’s AmeriCorps office, used federal funds designated for the AmeriCorps program to pay for a volunteer to work at another CPC, Healthy Moms and Babies.<sup>37</sup>

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<sup>29</sup> Nate Raymond, *Firm Settles Massachusetts Probe Over Anti-Abortion Ads Sent to Phones*, *Reuters*, Apr. 4, 2017, available at <https://www.reuters.com/article/us-massachusetts-abortion/firm-settles-massachusetts-probe-over-anti-abortion-ads-sent-to-phones-idUSKBN1761PX>.

<sup>30</sup> Press Release, *AG Reaches Settlement with Advertising Company Prohibiting ‘Geofencing’ Around Massachusetts Healthcare Facilities*, *Office of Attorney General Maura Healey*, Apr. 4, 2017, available at <https://www.mass.gov/news/ag-reaches-settlement-with-advertising-company-prohibiting-geofencing-around-massachusetts>.

<sup>31</sup> *Crisis Pregnancy Centers Lie: The Insidious Threat to Reproductive Freedom*, *NARAL Pro-Choice America*, available at <https://www.prochoiceamerica.org/wp-content/uploads/2017/04/cpc-report-2015.pdf>.

<sup>32</sup> Teddy Williams, *State-Level Republicans Pour Taxpayer Money Into Fake Clinics at an Unprecedented Pace*, *Rewire.News*, Feb. 16, 2018, available at <https://rewire.news/article/2018/02/16/state-level-republicans-pour-taxpayer-money-fake-clinics-unprecedented-pace/>.

<sup>33</sup> Appropriations Act of 2018, Senate Bill 99, General Assembly of North Carolina, February 16, 2017, available at [https://www.ncleg.gov/Sessions/2017/Budget/2018/S99-CCSMMxr-2\\_v2.pdf](https://www.ncleg.gov/Sessions/2017/Budget/2018/S99-CCSMMxr-2_v2.pdf); <https://mchb.hrsa.gov/maternal-child-health-initiatives/title-v-maternal-and-child-health-services-block-grant-program>.

<sup>34</sup> Marie McCullough, *Dispute Questions Anti-abortion Group’s Use of Taxpayer Dollars*, *The Inquirer*, Mar. 16, 2018, available at <https://www.philly.com/philly/health/real-alternatives-audit-department-human-services-taxpayer-money-20180316.html>.

<sup>35</sup> <https://www.guttmacher.org/state-policy/explore/choose-life-license-plates>.

<sup>36</sup> Family and Youth Initiatives, *Technical Application*, Ohio Parenting and Pregnancy Program Grant, Nov. 6, 2015, pg. 3, available at <https://www.documentcloud.org/documents/5817312-FYI-2015-Application-Attachment-A.html>; Press Release, *\$8 Million Available Through Ohio’s Community Connectors Program*, *Ohio Department of Education*, Feb. 7, 2018, available at [http://education.ohio.gov/Media/Media-Releases/\\$8-Million-Available-Through-Ohios-Community-Conn](http://education.ohio.gov/Media/Media-Releases/$8-Million-Available-Through-Ohios-Community-Conn).

<sup>37</sup> <https://www.santamaria-cincy.org/ameri-corps-program/>.

## Federal Funding for CPCs

In addition to various forms of state funding, CPCs have applied for and received federal funding for various initiatives including abstinence only education initiatives. While not part of their primary purpose, CPCs often use this funding as a way to keep their doors open.

Since 1981, the federal government has operated a variety of programs for abstinence-related educational programming. Currently HHS operates two abstinence programs, including a block grant program for states, and the Sexual Risk Avoidance Education program, which awards grants directly to providers of abstinence programs.<sup>38</sup> In 2018, Congress appropriated \$25 million for this program, which is often used to fund some CPCs.<sup>39</sup> For instance, in 2017, HHS awarded \$547,555 to Bethany Christian Services, a Michigan-based CPC, and \$548,103 to Elizabeth's New Life Center ("ENLC"), an Ohio-based CPC.<sup>40</sup> *Rewire.News* estimated that in 2017, HHS gave a total of \$3.1 million in abstinence related funds to CPCs.<sup>41</sup>

In addition to abstinence education funding, CPCs also receive federal money through other HHS programs like the Healthy Marriage and Responsible Fatherhood initiative.<sup>42</sup> For instance, in Fiscal Year 2015, as a part of that program, HHS awarded \$1.5 million to the RIDGE Project in Ohio, which then gave \$60,495 to FYI.<sup>43</sup> According to NARAL, CPCs receive around \$60 million annually from federal programs for abstinence only education and marriage promotion.<sup>44</sup>

## Section II: The Title X Program

While CPCs have been able to obtain federal funding for services unrelated to their stated anti-abortion mission, historically they have not been able to receive money through the Title X

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<sup>38</sup> Abstinence Education Programs: Definition, Funding, and Impact on Teen Sexual Behavior, Kaiser Family Foundation, June 1, 2018, available at <https://www.kff.org/womens-health-policy/fact-sheet/abstinence-education-programs-definition-funding-and-impact-on-teen-sexual-behavior/>; A History of Federal Funding for Abstinence-Only-Until-Marriage Programs, Sexuality Information and Education Council of the United States, Aug. 2018, available at <https://siecus.org/wp-content/uploads/2018/08/A-History-of-AOUM-Funding-Final-Draft.pdf>.

<sup>39</sup> *Id.*; *Multnomah County v. Alex M. Azar, Valerie Huber, and U.S. Department of Health and Human Services*, Case 3:18-cv-01015-HZ, Complaint, filed June 8, 2018, available at <https://democracyforward.org/wp-content/uploads/2018/06/Complaint.pdf>.

<sup>40</sup> <https://www.acf.hhs.gov/fysb/title-v-competitive-sexual-risk-avoidance-education-srae-grantees-fy2018>; <https://www.acf.hhs.gov/fysb/sexual-risk-avoidance-grantees-fy2017>.

<sup>41</sup> Teddy Wilson, Trump Gives Away Millions to Anti-Choice Fake Clinics, *Rewire.News*, Sep. 7, 2017, available at <https://rewire.news/article/2017/09/07/trump-gives-away-millions-anti-choice-fake-clinics/>.

<sup>42</sup> <https://www.acf.hhs.gov/ofa/resource/healthy-marriage-grantees>.

<sup>43</sup> Family and Youth Initiatives, Technical Application, Ohio Parenting and Pregnancy Program Grant, Nov. 6, 2015, pg. 3, available at <https://www.documentcloud.org/documents/5817312-FYI-2015-Application-Attachment-A.html>; <https://www.acf.hhs.gov/ofa/resource/healthy-marriage-grantees>; <https://www.ohiolife.org/parenting-and-pregnancy-support-program>.

<sup>44</sup> Kristen Dold, The Truth About Crisis Pregnancy Centers, *Women's Health*, Jan. 23, 2018, available at <https://www.womenshealthmag.com/health/a19994621/crisis-pregnancy-centers/>; Crisis Pregnancy Centers Lie: The Insidious Threat to Reproductive Freedom, NARAL Pro-Choice America, available at <https://www.prochoiceamerica.org/wp-content/uploads/2017/04/cpc-report-2015.pdf>.

family planning program.<sup>45</sup> From the beginning, the program was designed to provide low-income Americans with family planning services that include all available birth control options.

Direct funding for family planning services began in the 1960s under President Johnson's Great Society programs.<sup>46</sup> In 1970, President Nixon signed Title X of the Public Health Service Act into law, which set up the first national program to fund family planning services for low-income Americans.<sup>47</sup> Funding for the program has increased from around \$100 million in the mid-1970s to \$286.5 million in 2018.<sup>48</sup> Title X funds are awarded directly to organizations that provide comprehensive family planning services and to local and state governments.<sup>49</sup>

For most of the program's history, the majority of the funding was awarded to state and local public health departments.<sup>50</sup> In 1999, for instance, nearly 60 percent of title X funds were awarded to government health departments.<sup>51</sup> Today, about 52 percent of funds are awarded to municipal health departments.<sup>52</sup> The decrease in funding for state health departments can be traced, in part, to restrictions placed on Title X recipients by state legislatures that have tried to limit the ability of providers like Planned Parenthood to receive Title X funds.<sup>53</sup> For instance, some states have implemented procedures that give preferential treatment to health facilities that offer a full suite of healthcare services, which is unnecessary to provide Title X services.<sup>54</sup> Other states specifically eliminated certain existing Title X providers from the program.<sup>55</sup>

The regulations governing Title X lay out explicit criteria that recipients of program funds must adhere to in order to receive HHS grants.<sup>56</sup> Specifically, recipients "must [p]rovide a broad range of acceptable and effective medically approved family planning methods."<sup>57</sup> Additionally, "[i]f an organization offers only a single method of family planning, it may

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<sup>45</sup> Rosemary Westwood, *What Crisis Pregnancy Centers Stand to Gain From Trump's New Title X 'Gag Rule'*, *Pacific Standard*, Mar. 4, 2019, available at <https://psmag.com/social-justice/what-crisis-pregnancy-centers-stand-to-gain-from-trumps-new-title-x-gag-rule>.

<sup>46</sup> Title X: Three Decades of Accomplishment, *The Guttmacher Report on Public Policy*, February 2001, available at [https://www.guttmacher.org/sites/default/files/article\\_files/gr040105.pdf](https://www.guttmacher.org/sites/default/files/article_files/gr040105.pdf); Martha J. Bailey, Fifty Years of Family Planning: New Evidence on the Long-Run Effects of Increasing Access to Contraception, *Brookings Papers on Economic Activity*, Spring 2013, available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4203450/>.

<sup>47</sup> *Id.*

<sup>48</sup> <https://www.hhs.gov/opa/title-x-family-planning/about-title-x-grants/funding-history/index.html>.

<sup>49</sup> <https://www.nationalfamilyplanning.org/title-x-title-x-key-facts>.

<sup>50</sup> Title X: Three Decades of Accomplishment, *The Guttmacher Report on Public Policy*, February 2001, available at [https://www.guttmacher.org/sites/default/files/article\\_files/gr040105.pdf](https://www.guttmacher.org/sites/default/files/article_files/gr040105.pdf).

<sup>51</sup> *Id.*

<sup>52</sup> <https://www.nationalfamilyplanning.org/title-x-title-x-key-facts>.

<sup>53</sup> *Compliance With Title X Requirements by Project Recipients in Selecting Subrecipients*, Final Rule, *Office of Population Affairs, Office of the Secretary, Department of Health and Human Services*, Federal Register, Document Number 2016-30276, December 19, 2016, available at <https://www.federalregister.gov/documents/2016/12/19/2016-30276/compliance-with-title-x-requirements-by-project-recipients-in-selecting-subrecipients>.

<sup>54</sup> *Id.*

<sup>55</sup> *Id.*

<sup>56</sup> Kinsey Hasstedt, Unbiased Information on and Referral for All Pregnancy Options Are Essential to Informed Consent in Reproductive Health Care, *Guttmacher Institute*, Jan. 10, 2018, available at <https://www.guttmacher.org/gpr/2018/01/unbiased-information-and-referral-all-pregnancy-options-are-essential-informed-consent>.

<sup>57</sup> 42 CFR § 59.5(a)(1).

participate as part of a project as long as the entire project offers a broad range of family planning services.”<sup>58</sup> The regulations also state that recipients “must [o]ffer pregnant women the opportunity to be provided information and counseling regarding...[p]regnancy termination.”<sup>59</sup>

On March 4, 2019, HHS proposed a new rule for the Title X program that would have eased some of these requirements for CPCs.<sup>60</sup> Among other things, the new rule would have prohibited existing Title X recipients from continuing to receive funding if they provided abortions. The rule also would have prohibited providers from referring patients to other facilities in order to obtain abortions.<sup>61</sup> On April 25, 2019, a federal judge issued a nationwide injunction preventing the rule from going into effect.<sup>62</sup> The judge concluded that the proposed rule “likely violates the central purpose of Title X, which is to equalize access to comprehensive, evidence-based, and voluntary family planning.”<sup>63</sup>

Since applicants must abide by the existing Title X requirements, CPCs cannot comply and continue to pursue their anti-abortion and oftentimes anti-birth control mission.<sup>64</sup> Nevertheless, CPCs are determined obtain this direct funding, and the Obria Group is at the vanguard of CPCs that are positioning themselves as the national anti-choice vehicle to receive Title X funds.

### Section III: History of Obria

Obria is a conglomerate of CPCs based in Southern California that is trying to market itself as a national umbrella organization capable of delivering Title X services to a wide cross section of Americans.<sup>65</sup> On March 29, 2019, HHS awarded Obria \$1.7 million in Title X funds for fiscal year 2019.<sup>66</sup> Obria is eligible to receive two additional years of funding for a total of \$5.1 million.<sup>67</sup>

The organization collectively known as Obria refers to three separate 501c3 organizations deeply grounded in Catholic ideology: The Obria Group, Inc., Obria Medical Clinics of Southern California, Inc., and Toby’s House.<sup>68</sup> These entities were all formed decades ago, and both

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<sup>58</sup> *Id.*

<sup>59</sup> 42 CFR § 59.5(a)(5)(i).

<sup>60</sup> <https://www.hhs.gov/opa/title-x-family-planning/about-title-x-grants/statutes-and-regulations/index.html>.

<sup>61</sup> Press Release, *The Final Title X Regulation Disregards Expert Opinion and Evidence-Based Practices*, *American College of Obstetricians and Gynecologists*, Feb. 26, 2019, available at <https://www.acog.org/About-ACOG/News-Room/Statements/2019/Final-Title-X-Regulation-Disregards-Expert-Opinion-and-Evidence-Based-Practices>.

<sup>62</sup> Fred Barbash, *Trump Abortion ‘Gag’ Rule Blocked by Federal Judge*, *Washington Post*, April 25, 2019, available at [https://www.washingtonpost.com/national/health-science/trump-abortion-gag-rule-blocked-by-federal-judge/2019/04/25/c147359a-67ac-11e9-a1b6-b29b90efa879\\_story.html](https://www.washingtonpost.com/national/health-science/trump-abortion-gag-rule-blocked-by-federal-judge/2019/04/25/c147359a-67ac-11e9-a1b6-b29b90efa879_story.html).

<sup>63</sup> Order Granting Plaintiffs’ Motions for Preliminary Injunction, *State of Washington v. Alex M. Azar II and U.S. Department of Health and Human Services*, Case No. 1:19-cv-03040 (E.D. WA, 2019), pg. 15, available at <https://www.washingtonpost.com/context/judge-bastian-s-injunction-against-trump-family-planning-rule/>.

<sup>64</sup> Patricia Miller, *Anti-Choice Groups Prove It’s Not Just About Abortion Anymore*, *Rewire.News*, Apr. 10, 2019, available at <https://rewire.news/religion-dispatches/2019/04/10/anti-choice-groups-prove-its-not-just-about-abortion-anymore/>.

<sup>65</sup> This report refers to the collective entities as Obria and to each individual entity by name where appropriate.

<sup>66</sup> <https://www.hhs.gov/opa/grants-and-funding/recent-grant-awards/index.html>.

<sup>67</sup> <https://obriagroup.org/hhs-awards-title-x/>; <https://obriagroup.org/title-x-announcement/>.

<sup>68</sup> Unless otherwise noted, this report refers to the current name of each entity when describing their past activity.

Obria-named nonprofits have gone through several name changes.<sup>69</sup> This confusing and inconsistent history demonstrates how CPCs like Obria have sought to confuse women as well as donors and obtain state and federal funding through deceptive tactics.

<b>Obria Medical Clinics of Southern California</b>	
<i>Name Changes Over Time</i>	
<u>1985</u>	Birthright of Mission Viejo, Inc. <sup>70</sup>
<u>1993</u>	Birthright of Orange County, Inc. <sup>71</sup>
<u>2001</u>	Birth Choice Pregnancy Centers, Inc. <sup>72</sup>
<u>2014</u>	Obria Medical Clinics of Southern California, Inc. <sup>73</sup>

Obria is run by Kathleen Eaton Bravo, a strident Catholic who has “earned national acclaim for her work creating several faith-based, pro-life ministries.”<sup>74</sup> Ms. Bravo has said publicly that she started working at CPCs after she had an abortion in 1980.<sup>75</sup> Obria and Ms. Bravo have offered inconsistent explanations regarding the creation and growth of the organization that has become Obria.

The three nonprofits that today constitute Obria grew out of a single entity that was set up in the 1980s.<sup>76</sup> The exact genesis of that entity is unclear. The 2008 version of Obria’s website claimed that the CPC was set up in 1981 under the name Birth Choice Health Clinics, and Ms. Bravo’s LinkedIn profile states that she started working at the clinic that same year.<sup>77</sup> A biography of Ms. Bravo on the 2011 version of Obria’s website, however, states that she moved to California in 1986 and used her relocation “as an opportunity to reopen an existing [pregnancy resource center] in Mission Viejo.”<sup>78</sup>

<sup>69</sup> The Obria Group, Inc., Obria Medical Clinics of Southern California, Inc., and Toby’s House, Business Search, California Secretary of State, *accessed at* <https://businesssearch.sos.ca.gov/>.

<sup>70</sup> Articles of Incorporation, Birthright of Mission Viejo, Inc., California Secretary of State, filed Oct. 28, 1985, *available at* <https://www.documentcloud.org/documents/5817390-Birthright-of-Mission-Viejo-Inc-Obria-Medical-1985.html>.

<sup>71</sup> Articles of Incorporation, Amended, Birthright of Orange County, Inc., California Secretary of State, filed Dec. 2, 1993, *available at* <https://www.documentcloud.org/documents/5817394-Birthright-of-Orange-County-Inc-Obria-Medical-1993.html>.

<sup>72</sup> Articles of Incorporation, Amended, Birth Choice Pregnancy Centers, Inc., California Secretary of State, filed Jan. 26, 2001, *available at* <https://www.documentcloud.org/documents/5817395-Birth-Choice-Pregnancy-Centers-Inc-Obria-Medical.html>.

<sup>73</sup> Articles of Incorporation, Restated, Obria Medical Clinics of Southern California, Inc., California Secretary of State, filed Sep. 18, 2014, *available at* <https://www.documentcloud.org/documents/5817396-Obria-Medical-Clinics-of-Southern-California-Inc.html>.

<sup>74</sup> Ms. Bravo has been married several times. She is listed on Obria’s various 990s as Kathleen Eaton until 2010. Since 2011, she has listed her name as Kathleen Eaton Bravo. CfA’s report refers to her as Ms. Bravo throughout. <https://web.archive.org/web/20110812012439/http://www.birthchoiceoc.org/about/kathleens-story.html>.

<sup>75</sup> <https://obriagroup.org/about/>.

<sup>76</sup> The entity currently known as Obria Medical Clinics of Southern California Inc. is the original organization.

<sup>77</sup> <https://web.archive.org/web/20080705121143/http://www.birthchoiceoc.org/engage/history.html>; <https://www.linkedin.com/in/kathleen-eaton-bravo-8281027/>.

<sup>78</sup> <https://web.archive.org/web/20110812012439/http://www.birthchoiceoc.org/about/kathleens-story.html>.

Obria's official filings tell yet another story. The earliest filing with the California Secretary of State's office for the entity currently known as Obria Medical Clinics of Southern California is from 1985, when the executive director at the time, Susan T. Jordan, filed Articles of Incorporation for Birthright of Mission Viejo, Inc.<sup>79</sup> In 1993, Ms. Bravo filed an amended Articles of Incorporation and changed the name to Birthright of Orange County, Inc.<sup>80</sup> That was the first time Ms. Bravo was listed on the organization's state filings. Despite all of the signs that Ms. Bravo did not create the original iteration of Obria in the 1980s, she consistently describes herself as the "founder" of the organization.<sup>81</sup>

### *Kathleen Bravo's Changing Story*

The current biography of Ms. Bravo on Obria's website is riddled with errors concerning her involvement in the organization's history. The website states:

[I]n 1981 she started volunteering at a pregnancy center in Oklahoma before moving back to California to start three pregnancy centers in 1986 called Birth Choice, converting and growing them to six fully licensed medical clinics in 2006.<sup>82</sup>

According to state records, Ms. Bravo wasn't involved in the CPCs until 1993. Press reports from the 1990s indicate only one center existed at that time.<sup>83</sup> Finally, an older version of Obria's website from the time indicates the sixth center opened in 2010, not 2006.<sup>84</sup> The current website continues:

In 2012, [Ms. Bravo] rebranded to Obria Medical Clinics; in 2015, the Obria brand was trademarked and a business model for National Affiliation was created. In January 2017, The Obria Group was founded, which is the umbrella corporation uniting pro-life clinics as Affiliates under The Obria National Brand.<sup>85</sup>

However, according to state records, the brand Obria Medical Clinics of Southern California was set up in 2014, not 2012.<sup>86</sup> The Obria Group was founded as Teen Integrity in 2005, and later

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<sup>79</sup> Articles of Incorporation, Birthright of Mission Viejo, Inc., California Secretary of State, filed Oct. 28, 1985, available at <https://www.documentcloud.org/documents/5817390-Birthright-of-Mission-Viejo-Inc-Obria-Medical-1985.html>.

<sup>80</sup> Articles of Incorporation, Amended, Birthright of Orange County, Inc., California Secretary of State, filed Dec. 2, 1993, available at <https://www.documentcloud.org/documents/5817394-Birthright-of-Orange-County-Inc-Obria-Medical-1993.html>.

<sup>81</sup> <https://web.archive.org/web/20080509085145/http://www.birthchoiceoc.org/>; <https://obriagroup.org/about/>.

<sup>82</sup> <https://obriagroup.org/about/>.

<sup>83</sup> Jeordan Legon, *Non-profit Group of Abortion Foes Dedicates Offices*, *Orange County Register*, Oct. 5, 1992; Andrew F. Puzder, *Welfare that Keeps on Working; The Self-reliance Model Works Better Than Direct Government Aid*, *Orange County Register*, Mar. 16, 1997.

<sup>84</sup> <https://web.archive.org/web/20111106233704/http://www.bchcdonor.org/about/locations.html>.

<sup>85</sup> <https://obriagroup.org/about/>.

<sup>86</sup> Articles of Incorporation, Restated, Obria Medical Clinics of Southern California, Inc., California Secretary of State, filed Sep. 18, 2014, available at <https://www.documentcloud.org/documents/5817396-Obria-Medical-Clinics-of-Southern-California-Inc.html>; Articles of Incorporation, Restated, The Obria Foundation, Inc., California Secretary of State, filed Sep. 26, 2014, available at <https://www.documentcloud.org/documents/5817641-The-Obria-Foundation-Inc-Obria-Group-2014.html>.

became The Obria Foundation in 2014 and The Obria Group in 2016, not 2017 as Ms. Bravo's biography claims.<sup>87</sup>

<b>The Obria Group, Inc.</b>	
<i>Name Changes Over Time</i>	
<u>2005</u>	Teen Integrity, Inc. <sup>88</sup>
<u>2014</u>	The Obria Foundation, Inc. <sup>89</sup>
<u>2016</u>	The Obria Group, Inc. <sup>90</sup>

### *Obria's Development*

Obria's history parallels the rise of CPCs across the country. After coming online in the 1980s, Obria followed the traditional CPC model to recruit and mislead women. At a new office dedication in 1992, the *Orange County Register* described the group, which was known as Birthright of Orange County at the time:

Birthright of Orange County is a non-denominational group that provides "alternatives to abortion." The group, with franchises nationwide, finds clients by advertising in magazines and telephone books.

And:

During the dedication, Bishop Michael Driscoll of the Diocese of Orange blessed the offices.<sup>91</sup>

In 1997, the *Register* published an op-ed about Obria by Andrew Puzder, chairman of the board.<sup>92</sup> Twenty years later, President Trump nominated Mr. Puzder to be the Secretary of Labor, but Mr. Puzder withdrew after 1980s allegations of domestic violence against him

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<sup>87</sup> *Id.*; Articles of Incorporation, Teen Integrity, Inc. California Secretary of State, filed Apr. 15, 2005, available at <https://www.documentcloud.org/documents/5817640-Teen-Integrity-Inc-Obria-Group-2005.html>; Articles of Incorporation, Amended and Restated, The Obria Group, Inc., California Secretary of State, filed Oct. 27, 2016, available at <https://www.documentcloud.org/documents/5817642-The-Obria-Group-Inc-Obria-Group-2016.html>.

<sup>88</sup> Articles of Incorporation, Teen Integrity, Inc. California Secretary of State, filed Apr. 15, 2005, available at <https://www.documentcloud.org/documents/5817640-Teen-Integrity-Inc-Obria-Group-2005.html>.

<sup>89</sup> Articles of Incorporation, Restated, The Obria Foundation, Inc., California Secretary of State, filed Sep. 26, 2014, available at <https://www.documentcloud.org/documents/5817641-The-Obria-Foundation-Inc-Obria-Group-2014.html>.

<sup>90</sup> Articles of Incorporation, Amended and Restated, The Obria Group, Inc., California Secretary of State, filed Oct. 27, 2016, available at <https://www.documentcloud.org/documents/5817642-The-Obria-Group-Inc-Obria-Group-2016.html>.

<sup>91</sup> Jeordan Legon, *Non-profit Group of Abortion Foes Dedicates Offices*, *Orange County Register*, Oct. 5, 1992.

<sup>92</sup> Andrew F. Puzder, *Welfare that Keeps on Working: The Self-reliance Model Works Better Than Direct Government Aid*, *Orange County Register*, Mar. 16, 1997; <http://andy.puzder.com/bio/>.

resurfaced.<sup>93</sup> In the 1997 op-ed, Mr. Puzder detailed Obria's explicitly religious purpose and the inherent conflict between its mission and accepting federal funds:

Birthright is a crisis pregnancy center located in San Juan Capistrano that addresses the needs of women and their children on a very individual basis.

Because it is pro-life, it finds the strings attached to federal funding unacceptable and survives solely on private charitable contributions.

And:

A short visit to their office and it is easy to see that the kind of personal involvement and commitment present at Birthright would be all but impossible in any government-dominated program regardless of the resources.<sup>94</sup>

Mr. Puzder, whose ex-wife said in divorce filings in 1988 that he abused her, also wrote of Obria:

[W]here tough love is necessary, it is used.

Based on the text of Mr. Puzder's op-ed, it appears that Obria Medical Clinics of Southern California was operating just one center at the time.

#### **Section IV: Obria's Search for Funding**

##### *Toby's House*

Mr. Puzder's op-ed also noted the difficulty in securing funds to pay for full-time employees. He wrote that the organization "has no paid staff or supervisors."<sup>95</sup> Around this time, Ms. Bravo began looking for indirect ways to obtain government funding. In 1999, Ms. Bravo set up another nonprofit called Toby's House.<sup>96</sup> Like Obria, Ms. Bravo has been inconsistent in describing the creation of Toby's House. Her LinkedIn profile states that it was created in 1996, and she has said elsewhere that it was created in 1998.<sup>97</sup>

In the Articles of Incorporation filed in 1999, Ms. Bravo wrote, "The specific purpose of this corporation is to provide safe, low-cost, temporary housing to women in financial need

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<sup>93</sup> Alan Rappeport, Andrew Puzder Withdraws From Consideration as Labor Secretary, *The New York Times*, Feb. 15, 2017, available at <https://www.nytimes.com/2017/02/15/us/politics/andrew-puzder-withdrew-labor-secretary.html>.

<sup>94</sup> Andrew F. Puzder, Welfare that Keeps on Working: The Self-reliance Model Works Better Than Direct Government Aid, *Orange County Register*, Mar. 16, 1997.

<sup>95</sup> *Id.*

<sup>96</sup> Articles of Incorporation, Toby's House, California Secretary of State, filed Apr. 12, 1999, available at <https://www.documentcloud.org/documents/5817651-Toby-s-House-1999.html>.

<sup>97</sup> <https://www.linkedin.com/in/kathleen-eaton-bravo-8281027/>; Dennis Kaiser, Disney Awards Toby's House; Shelter's Director Shares Her Special Connection to Toby's House Residents, *Orange County Register*, Nov. 6, 2003.

during their pregnancy and immediately thereafter.”<sup>98</sup> Toby’s House eventually operated three shelters for transitional housing for homeless individuals.<sup>99</sup> The shelters also provided educational and counseling programs to help residents become respectable members of society. Beyond programming, Toby’s House developed a thrift store to sell items to raise money for the nonprofit. During the first years of its existence, Toby’s House relied on private donations and income from the thrift store to keep its operations afloat.<sup>100</sup>

By 2003, though, Toby’s House had successfully secured its first government grant. According to its tax filings, Toby’s House received \$18,330 in government contributions that year while its total revenue increased by only \$2,000 to \$403,716.<sup>101</sup> Interestingly, 2003 is also the first year that Ms. Bravo started receiving a salary.<sup>102</sup> Toby’s House and Obria Medical Clinics of Southern California each paid Ms. Bravo a salary of \$16,150 in 2003.<sup>103</sup> Ms. Bravo has continued to receive a salary since 2003.<sup>104</sup>

Following its initial government funding, Toby’s House continued to receive government grants and used the funds to pay Ms. Bravo’s salary. An old version of Toby’s House’s website states that the organization received funding from or partnered with several local governmental organizations including Orange County Perinatal Program, Orange County Sheriff’s Department, and Orange County Social Services.<sup>105</sup> In 2004 and 2005, Toby’s House received a total of \$338,735 in government contributions, and paid Ms. Bravo a total of \$71,300 in salary.<sup>106</sup>

By 2005, Toby’s House had started receiving federal grants as well. According to USAspending.gov, the Office of Justice Programs at the U.S. Department of Justice (“DOJ”) awarded two grants to Toby’s House.<sup>107</sup> DOJ awarded \$174,527 to Toby’s House on September 12, 2005, and \$173,898 on September 3, 2008 covering a period of performance between

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<sup>98</sup>Articles of Incorporation, Toby’s House, California Secretary of State, filed Apr. 12, 1999, *available at* <https://www.documentcloud.org/documents/5817651-Toby-s-House-1999.html>.

<sup>99</sup> Donna Bunce, *Auction Items Help Raise a Record for Toby's House*, *Orange County Register*, May 23, 2006, *available at* <https://www.ocregister.com/2006/05/23/auction-items-help-raise-a-record-for-tobys-house/>.

<sup>100</sup> Dennis Kaiser, *Disney Awards Toby's House; Shelter's Director Shares Her Special Connection to Toby's House Residents*, *Orange County Register*, Nov. 6, 2003.

<sup>101</sup> 2003 Return of Organization Exempt from Income Tax, Form 990, Toby’s House, filed Sep. 21, 2004, *available at* [https://projects.propublica.org/nonprofits/display\\_990/330871193/2004\\_09\\_EO%2F33-0871193\\_990\\_200312](https://projects.propublica.org/nonprofits/display_990/330871193/2004_09_EO%2F33-0871193_990_200312).

<sup>102</sup> *Id.*

<sup>103</sup> *Id.*; 2003 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., filed Sep. 21, 2004, *available at* [https://projects.propublica.org/nonprofits/display\\_990/330150193/2004\\_09\\_EO%2F33-0150193\\_990\\_200312](https://projects.propublica.org/nonprofits/display_990/330150193/2004_09_EO%2F33-0150193_990_200312).

<sup>104</sup> See <https://projects.propublica.org/nonprofits/organizations/330150193>;  
<https://projects.propublica.org/nonprofits/organizations/593804603>.

<sup>105</sup> <https://web.archive.org/web/20090731181235/http://www.tobyshouse.org/>;  
<https://web.archive.org/web/20120315193631/http://www.tobyshouse.org/aboutTH.html>.

<sup>106</sup> 2004 Return of Organization Exempt from Income Tax, Form 990, Toby’s House, filed Apr. 25, 2005, *available at* [https://projects.propublica.org/nonprofits/display\\_990/330871193/2005\\_06\\_EO%2F33-0871193\\_990\\_200412](https://projects.propublica.org/nonprofits/display_990/330871193/2005_06_EO%2F33-0871193_990_200412).

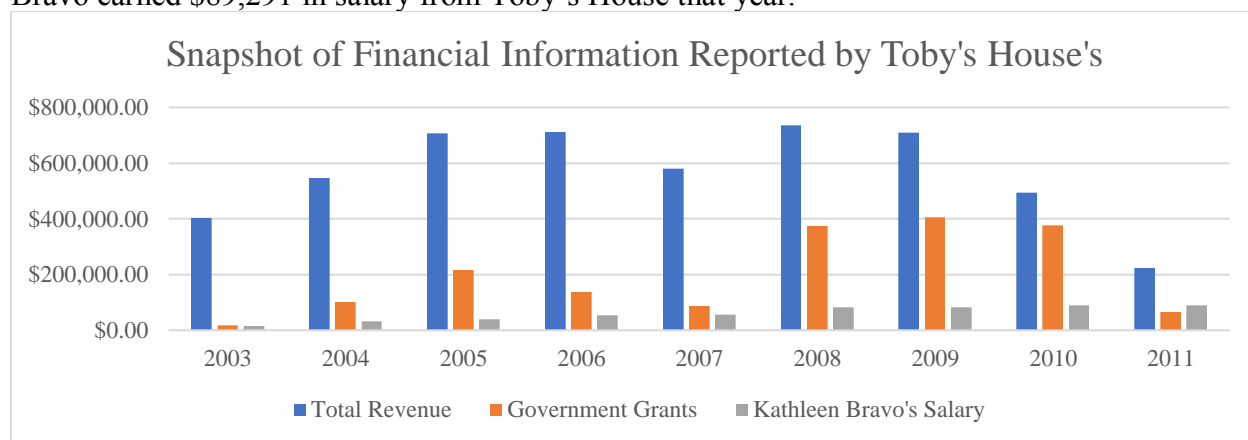
2005 Return of Organization Exempt from Income Tax, Form 990, Toby’s House, filed May 12, 2005(sic), received May 26, 2006, *available at* [https://projects.propublica.org/nonprofits/display\\_990/330871193/2006\\_07\\_EO%2F33-0871193\\_990\\_200512](https://projects.propublica.org/nonprofits/display_990/330871193/2006_07_EO%2F33-0871193_990_200512).

<sup>107</sup> <https://www.usaspending.gov/#/award/45173533>.

September 1, 2005 and August 31, 2011.<sup>108</sup> The purpose of the grants was to provide transitional housing assistance and related support services.<sup>109</sup>

Following the DOJ grant, Toby's House also secured funding from the U.S. Department of Housing and Urban Development ("HUD"). According to USAspending.gov, HUD awarded four grants to Toby's house between 2007 and 2011 for a total of \$516,870.<sup>110</sup> HUD provided the grants to Toby's House under two programs that provide funding to alleviate homelessness.<sup>111</sup> The grants were part of a larger grant from HUD to Orange County, California to support homeless populations.<sup>112</sup> In 2010, while still in the period of performance for these grants, Toby's House closed its thrift store.<sup>113</sup>

In the late 2000s, Toby's House received a dramatic boost in funding from HHS. Between 2008 and 2012, Toby's House received \$757,000 from HHS through the Transitional Living Program, which was designed to help young adults "establish sustainable living and well-being for themselves and if applicable, their dependent child(ren)."<sup>114</sup> According to USAspending.gov, the last portion of the grant, \$151,400, was distributed to Toby's House on February 29, 2012.<sup>115</sup> That year, Toby's House reported to the IRS that it raised a total of \$222,740, so the HHS grant constituted 68 percent of all of Toby's House's revenue.<sup>116</sup> Ms. Bravo earned \$89,291 in salary from Toby's House that year.<sup>117</sup>



By the end of the decade, Toby's House was a sizable nonprofit that was relying on federal funds to cover a significant portion of its expenses. Between 2003 and 2011, Toby's House received about \$1.8 million in government grants out of about \$4.7 million in total

<sup>108</sup> *Id.*

<sup>109</sup> *Id.*

<sup>110</sup> <https://www.usaspending.gov/#/award/63011472>; <https://www.usaspending.gov/#/award/48436147>; <https://www.usaspending.gov/#/award/48436148>; <https://www.usaspending.gov/#/award/48436149>.

<sup>111</sup> <https://www.usaspending.gov/#/award/63011472>; <https://www.usaspending.gov/#/award/48436147>; <https://www.usaspending.gov/#/award/48436148>.

<sup>112</sup> <http://www.orangejuiceblog.com/2009/12/orange-county-awarded-11-million-hud-grant-to-help-the-homeless/>.

<sup>113</sup> Brittany Levine, *San Clemente Thrift Store Closes*, *Orange County Register*, May 8, 2010, available at <https://www.ocregister.com/2010/05/07/womens-shelters-thrift-store-closes/>.

<sup>114</sup> <https://www.usaspending.gov/#/award/39371068>.

<sup>115</sup> *Id.*

<sup>116</sup> 2011 Return of Organization Exempt from Income Tax, Form 990, Toby's House, filed May 13, 2013, available at [https://projects.propublica.org/nonprofits/display\\_990/330871193/2013\\_08\\_EO%2F33-0871193\\_990\\_201209](https://projects.propublica.org/nonprofits/display_990/330871193/2013_08_EO%2F33-0871193_990_201209).

<sup>117</sup> *Id.*

contributions.<sup>118</sup> For this period, Ms. Bravo received more than \$500,000 in salary from Toby's House.<sup>119</sup>

Notably, Ms. Bravo also ran her own for-profit company at the same time she received a salary from Obria Medical Clinics of Southern California.<sup>120</sup> Like much of her story, this too has changed over time. In 2019, Ms. Bravo told *The Daily Signal* that she gave up her consulting business before she started Obria.<sup>121</sup>

These eight years constitute the height of Toby's House's success: its revenue peaked in 2008. During this time, Toby's House's tax filings reveal a pattern of questionable behavior. In 2007, for instance, the organization raised a total of \$581,214, and paid \$431,202 to one contractor for human resources.<sup>122</sup> Roughly three-fourths of the organization's entire budget was paid out to the payroll firm, Full Time Solutions.<sup>123</sup> After Toby's House began to decline in 2009, it started to rely heavily on government grants. In 2010, more than three-fourths of Toby's House's revenue came from government funding.<sup>124</sup> Despite Toby's House's waning finances, Ms. Bravo's questionably high salary increased during this period from \$81,842 in 2009 to \$89,291 in 2011.<sup>125</sup>

Beyond questionable finances, the organization also carried out an explicitly religious operation. A 2011 job posting detailed the Christian mission of the organization:

House Manager (Volunteer) Toby's House is a faith-based (Christian) home for pregnant women and their toddlers. Located in Capistrano Beach we are seeking a Christian woman to be a live-in House Manager. She has her own large, private bedroom and bathroom. She receives free housing, utilities and home supplies in exchange for living in the home. The House Manager serves as a role model for responsibility, cleanliness and faith to the young women who come to us for help. There are no set schedules, the House Manager works and lives her own life while residing in the home. Primary time commitment is to be in the home at night to monitor the residents' curfew.<sup>126</sup>

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<sup>118</sup> <https://projects.propublica.org/nonprofits/organizations/330871193>.

<sup>119</sup> *Id.*

<sup>120</sup> Zoe Romanowsky, *Kathleen Eaton Bravo is on a Mission to Change the Pro-life Movement*, *Aleteia*, Nov. 14, 2016, available at <https://aleteia.org/2016/11/14/kathleen-eaton-bravo-is-on-a-mission-to-change-the-pro-life-movement/>.

<sup>121</sup> Rachel del Guidice, *HHS Makes \$5.1 Million Grant to Pro-Life Community Clinics*, *The Daily Signal*, Mar. 29, 2019, available at <https://www.dailysignal.com/2019/03/29/exclusive-hhs-grant-set-for-pro-life-community-clinics/>.

<sup>122</sup> 2007 Return of Organization Exempt from Income Tax, Form 990, Toby's House, filed Aug. 14, 2008, available at [https://projects.propublica.org/nonprofits/display\\_990/330871193/2008\\_09\\_EO%2F33-0871193\\_990\\_200712](https://projects.propublica.org/nonprofits/display_990/330871193/2008_09_EO%2F33-0871193_990_200712).

<sup>123</sup> <https://www.linkedin.com/in/jay-talley-03850222/>.

<sup>124</sup> 2010 Return of Organization Exempt from Income Tax, Form 990, Toby's House, filed July 9, 2012, available at [https://projects.propublica.org/nonprofits/display\\_990/330871193/2012\\_08\\_EO%2F33-0871193\\_990\\_201109](https://projects.propublica.org/nonprofits/display_990/330871193/2012_08_EO%2F33-0871193_990_201109).

<sup>125</sup> 2009 Return of Organization Exempt from Income Tax, Form 990, Toby's House, filed July 27, 2011, available at [https://projects.propublica.org/nonprofits/display\\_990/330871193/2011\\_08\\_EO%2F33-0871193\\_990\\_201009](https://projects.propublica.org/nonprofits/display_990/330871193/2011_08_EO%2F33-0871193_990_201009); 2011 Return of Organization Exempt from Income Tax, Form 990, Toby's House, filed May 13, 2013, available at [https://projects.propublica.org/nonprofits/display\\_990/330871193/2013\\_08\\_EO%2F33-0871193\\_990\\_201209](https://projects.propublica.org/nonprofits/display_990/330871193/2013_08_EO%2F33-0871193_990_201209).

<sup>126</sup> [https://www.21loc.org/images/HPF/2011/hpf\\_2011-01-6\\_minutes\\_1259.pdf](https://www.21loc.org/images/HPF/2011/hpf_2011-01-6_minutes_1259.pdf).

Despite the job posting, Toby's House was nearing its demise. In 2011, the organization raised a little more than \$220,000. Toby's House's revenue then decreased to about \$130,000 in 2012 and to just \$2,767 in 2013. Toby's House has not filed a complete tax filing since 2013 and appears to be largely defunct. The organization said in its 2012 tax filing, filed on March 4, 2014:

Toby's House has experienced a contraction of its operations due to a reduction in the need for its services. The organization has disposed of its assets as it works to reidentify its mission and re-establish itself.<sup>127</sup>

On the same form, Toby's house disclosed that it transferred \$307,403 in funds to Obria Medical Clinics of Southern California.<sup>128</sup> Today, Toby's House is essentially an empty shell, but the organization is still technically active. Toby's House filed an updated annual form with the California Secretary of State's office in 2018.<sup>129</sup> The rise and fall of Toby's House reveals how Obria cashed in on the government grants awarded to Toby's House to help carry out its other programs and pay for Ms. Bravo's salary.

### *Teen Integrity*

Teen Integrity appears to have been another, yet much less successful, attempt to use government funds to cover the cost of running Obria's CPCs. Ms. Bravo set up Teen Integrity as a separate 501(c)(3) organization in 2005.<sup>130</sup> The group's Articles of Incorporation stated, "The specific purpose of this corporation is to provide education on issues concerning human sexuality and related matters."<sup>131</sup> The organization's annual tax filing indicates the group raised nearly \$30,000 in its first year of existence, including through a loan from Obria Medical Clinics of Southern California.<sup>132</sup> The tax filing discloses the interconnectedness of Toby's House, Teen Integrity, and Obria Medical Clinics of Southern California.

Toby's House, Inc. and [Obria Medical Clinics of Southern California] are separate 501(c)(3) non-profit organizations. Toby's House and [Obria Medical Clinics of Southern California] are closely related due to the fact that each organization shares the same Board of Directors and Executive Director. Teen Integrity has borrowed money from [Obria Medical Clinics of Southern California], which is further disclosed in notes to the financial statements. There

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<sup>127</sup> 2012 Return of Organization Exempt from Income Tax, Form 990, Toby's House, filed Mar. 4, 2014, *available at* [https://projects.propublica.org/nonprofits/display\\_990/330871193/2014\\_03\\_EO%2F33-0871193\\_990\\_201309](https://projects.propublica.org/nonprofits/display_990/330871193/2014_03_EO%2F33-0871193_990_201309).

<sup>128</sup> *Id.*

<sup>129</sup> Statement of Information, Toby's House, California Secretary of State, filed Mar. 9, 2018, *available at* <https://www.documentcloud.org/documents/5819502-Tobys-House-2018.html>.

<sup>130</sup> Articles of Incorporation, Teen Integrity, Inc. California Secretary of State, filed Apr. 15, 2005, *available at* <https://www.documentcloud.org/documents/5817640-Teen-Integrity-Inc-Obria-Group-2005.html>.

<sup>131</sup> *Id.*

<sup>132</sup> 2005 Return of Organization Exempt from Income Tax, Form 990, Teen Integrity, pg. 16, filed Feb. 6, 2006, *available at* [https://projects.propublica.org/nonprofits/display\\_990/593804603/2006\\_03\\_EO%2F59-3804603\\_990EZ\\_200512](https://projects.propublica.org/nonprofits/display_990/593804603/2006_03_EO%2F59-3804603_990EZ_200512).

are also transactions, which are billed to [Obria Medical Clinics of Southern California] that are partially paid by Teen Integrity as their expense.<sup>133</sup>

Shortly after the nonprofit started, Ms. Bravo said that it served as Obria's "education arm, where we reach out to teens to help them deal with healthy dating, relationships and self-esteem."<sup>134</sup> That effort appears to have floundered. Between 2005 and 2013, the organization reported total revenues of just \$135,921.<sup>135</sup>

Teen Integrity's failed launch appears to stem from its inability to acquire federal funding. Archived documents from Obria's old website reveal that Ms. Bravo created Teen Integrity solely as a vehicle to receive federal funding from the Title V abstinence education programs. A note from Obria's 2006 Ministry Report states:

Teen Integrity has applied for a \$2,000,000 over five year Faith-Based Grant from the Federal Government's Abstinence Education Program, under the Department of Health and Human Services. If awarded, funds will underwrite Teen Integrity's budget from 2007 through 2012.<sup>136</sup>

Teen Integrity never received the HHS grant. Only in 2007 did the organization report receiving any government funding at all. That year, out of a total \$43,609 raised, \$38,955 came from government sources, which appears to be local government funding.<sup>137</sup> That appears to be the last year the organization sought to expand its services.<sup>138</sup> Revenue dropped to \$14,855 in 2008 and to just \$2,215 in 2009.<sup>139</sup> Ms. Bravo never received a salary from Teen Integrity.<sup>140</sup>

Notably, in 2009, Obria did receive a large government grant from the Orange County Board of Supervisors for abstinence education, but the money was directed to Obria Medical Clinics of Southern California, not Teen Integrity. At the time, Ms. Bravo advertised the Teen Integrity mission to the *Los Angeles Times*: "Eaton said the program teaches about contraception but is an 'abstinence-based' program."<sup>141</sup> The Board of Supervisors awarded more than \$600,000 to Obria Medical Clinics of Southern California between 2009 and 2015.<sup>142</sup> The Board

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<sup>133</sup> *Id.*

<sup>134</sup> Donna Bunce, Auction Items Help Raise a Record for Toby's House, *Orange County Register*, May 23, 2006, available at <https://www.ocregister.com/2006/05/23/auction-items-help-raise-a-record-for-tobys-house/>.

<sup>135</sup> <https://projects.propublica.org/nonprofits/organizations/593804603>.

<sup>136</sup> Ministry Report 2006, Birth Choice Health Clinics, available at <https://web.archive.org/web/20060926011122/http://www.birthchoiceoc.org/BCdonorgraphics/BCMinistryReportFF6final.pdf>.

<sup>137</sup> 2007 Return of Organization Exempt from Income Tax, Form 990, Teen Integrity, filed July 11, 2008, available at [https://projects.propublica.org/nonprofits/display\\_990/593804603/2008\\_07\\_EO%2F59-3804603\\_990\\_200712](https://projects.propublica.org/nonprofits/display_990/593804603/2008_07_EO%2F59-3804603_990_200712).

<sup>138</sup> <https://projects.propublica.org/nonprofits/organizations/593804603>.

<sup>139</sup> *Id.*

<sup>140</sup> *Id.*

<sup>141</sup> Tami Abdollah, Orange County Official Considers Shifting Planned Parenthood Funds to an Antiabortion Group, *Los Angeles Times*, Mar. 14, 2009, available at <https://www.latimes.com/archives/la-xpm-2009-mar-14-me-planned-parenthood14-story.html>.

<sup>142</sup> <http://www1.ochca.com/ochcahealthinfo.com/docs/admin/TSR/TobaccoSettlement2009-10.pdf>;  
[http://cams.ocgov.com/Web\\_Publisher\\_Sam/Agenda05\\_25\\_2010\\_files/images/A10-000574.HTM](http://cams.ocgov.com/Web_Publisher_Sam/Agenda05_25_2010_files/images/A10-000574.HTM);  
[http://cams.ocgov.com/Web\\_Publisher\\_Sam/Agenda06\\_07\\_2011\\_files/images/O00211-000262A.PDF](http://cams.ocgov.com/Web_Publisher_Sam/Agenda06_07_2011_files/images/O00211-000262A.PDF);  
[http://cams.ocgov.com/Web\\_Publisher\\_Sam/Agenda05\\_22\\_2012\\_files/images/O00212-000464A.PDF](http://cams.ocgov.com/Web_Publisher_Sam/Agenda05_22_2012_files/images/O00212-000464A.PDF);

used money awarded from the national tobacco settlement to fund this initiative.<sup>143</sup> Ms. Bravo's bait and switch with the Orange County Board of Supervisors appears to have been just one of many maneuvers she employed to cover the cost of running her CPCs.

Teen Integrity, for its part, remained dormant for several years. Eventually, Ms. Bravo used the Teen Integrity entity to launch Obria's national brand of CPCs. The entity's name was changed to The Obria Foundation, Inc. in 2014 and finally to The Obria Group, Inc. in 2016.<sup>144</sup> This entity is now the national umbrella organization that coordinates Obria's affiliates.<sup>145</sup> Obria Medical Clinics of Southern California is now the entity for Obria's own affiliate clinics.<sup>146</sup>

While Obria worked to obtain federal funds through Toby's House and Teen Integrity, the CPC side of the business maintained its presence in Southern California. Throughout the 1990s, it appears, based on a close reading of press reports, that Obria Medical Clinics of Southern California operated only one location.<sup>147</sup> In the early 2000s, though, Obria Medical Clinics of Southern California began to multiply.

## Section V: Obria "Goes Medical"

Obria Medical Clinics of Southern California reported just \$216,670 in revenue in 2001, but revenue increased to more than \$700,000 in 2005 when it was operating at least three clinics.<sup>148</sup> That year, Obria Medical Clinics of Southern California received a congressional earmark designating \$148,800 "to support counseling and medical services at three pregnancy centers in Orange County, CA."<sup>149</sup> Ms. Bravo started receiving an annual salary from Obria Medical Clinics in 2003 according to its tax filings, despite the claim of a 2011 version of

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[http://cams.ocgov.com/Web\\_Publisher\\_Sam/Agenda05\\_20\\_2014\\_files/images/O00414-000235A.PDF](http://cams.ocgov.com/Web_Publisher_Sam/Agenda05_20_2014_files/images/O00414-000235A.PDF);  
[http://cams.ocgov.com/Web\\_Publisher\\_Sam/Agenda05\\_19\\_2015\\_files/images/O00215-000052A.PDF](http://cams.ocgov.com/Web_Publisher_Sam/Agenda05_19_2015_files/images/O00215-000052A.PDF).

<sup>143</sup> Tami Abdollah, *Orange County Official Considers Shifting Planned Parenthood Funds to an Antiabortion Group*, *Los Angeles Times*, Mar. 14, 2009, available at <https://www.latimes.com/archives/la-xpm-2009-mar-14-me-planned-parenthood14-story.html>.

<sup>144</sup> Articles of Incorporation, Restated, The Obria Foundation, Inc., California Secretary of State, filed Sep. 26, 2014, available at <https://www.documentcloud.org/documents/5817641-The-Obria-Foundation-Inc-Obria-Group-2014.html>; Articles of Incorporation, Amended and Restated, The Obria Group, Inc., California Secretary of State, filed Oct. 27, 2016, available at <https://www.documentcloud.org/documents/5817642-The-Obria-Group-Inc-Obria-Group-2016.html>.

<sup>145</sup> <https://obriagroup.org/about/>.

<sup>146</sup> <https://omcsocal.org/>.

<sup>147</sup> The few articles about Obria mention only one location, but a 2011 version of the website claims that Obria opened a second location in 1988. This may be the date the clinic was opened but it may have come under Obria's control at a later date. See

<https://web.archive.org/web/20111107211732/http://www.bchcdonor.org/about/history.html>.

<sup>148</sup> 2001 Return of Organization Exempt from Income Tax, Form 990, Birthright of Orange County, filed May 11, 2002, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2002\\_07\\_EO%2F33-0150193\\_990\\_200112](https://projects.propublica.org/nonprofits/display_990/330150193/2002_07_EO%2F33-0150193_990_200112); 2005 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., filed May 13, 2006, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2006\\_06\\_EO%2F33-0150193\\_990\\_200512](https://projects.propublica.org/nonprofits/display_990/330150193/2006_06_EO%2F33-0150193_990_200512).

<sup>149</sup> <https://www.govinfo.gov/content/pkg/FR-2005-06-23/html/05-12431.htm>.

Obria's website that "until 2005, [Obria Medical Clinics of Southern California] was completely volunteer run."<sup>150</sup>

Beginning in 2005, Obria implemented a swath of changes. That year Obria Medical Clinics of Southern California announced plans to turn its CPCs into licensed medical centers, which is a requirement in order to operate ultrasound machines.<sup>151</sup> Obria is accredited by the Accreditation Association for Ambulatory Health Care ("AAAH"), which accredits a wide variety of healthcare facilities including college health centers and dental practices.<sup>152</sup> By the end of 2005, Obria had opened one licensed clinic.<sup>153</sup> In 2006, Focus on the Family awarded Obria Medical Clinics of Southern California a grant to cover the cost of providing ultrasound machines to the clinics, and by July, Obria Medical Clinics was operating four licensed clinics.<sup>154</sup>

As Obria Medical Clinics of Southern California shifted to obtaining medical licenses for its facilities, its revenues skyrocketed. Between 2005 and 2010, Obria Medical Clinics of Southern California's reported revenue tripled from more than \$700,000 to more than \$2.2 million.<sup>155</sup> Obria Medical Clinics opened its sixth CPC in 2010.<sup>156</sup>

This dramatic increase in revenue was provided in part by increased funding from religious institutions.<sup>157</sup> In 2008, Obria Medical Clinics of Southern California received just \$16,338 from the Roman Catholic Bishop of Orange County, but raised an astounding \$881,018 through one fundraising gala.<sup>158</sup> Two years later, Obria Medical Clinics of Southern California hosted a ribbon cutting ceremony after the Knights of Columbus, a Catholic organization, paid

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<sup>150</sup> <https://web.archive.org/web/20111107211732/http://www.bchcdonor.org/about/history.html>; 2003 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., filed Sep. 21, 2004, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2004\\_09\\_EO%2F33-0150193\\_990\\_200312](https://projects.propublica.org/nonprofits/display_990/330150193/2004_09_EO%2F33-0150193_990_200312).

<sup>151</sup> <https://web.archive.org/web/20060926010949/http://www.birthchoiceoc.org/BCdonorgraphics/newspdfs/BC-july2006ffg.pdf>.

<sup>152</sup> <https://www.aaahc.org/accreditation/accreditation-general-information/#types-of-orgs-accredited>; <https://omcsocal.org/aboutus>.

<sup>153</sup> <https://web.archive.org/web/20111107211732/http://www.bchcdonor.org/about/history.html>.

<sup>154</sup> <https://web.archive.org/web/20060926010949/http://www.birthchoiceoc.org/BCdonorgraphics/newspdfs/BC-july2006ffg.pdf>.

<sup>155</sup> 2005 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc. filed May 13, 2006, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2006\\_06\\_EO%2F33-0150193\\_990\\_200512](https://projects.propublica.org/nonprofits/display_990/330150193/2006_06_EO%2F33-0150193_990_200512); 2010 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc. filed May 24, 2012, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2012\\_06\\_EO%2F33-0150193\\_990\\_201109](https://projects.propublica.org/nonprofits/display_990/330150193/2012_06_EO%2F33-0150193_990_201109).

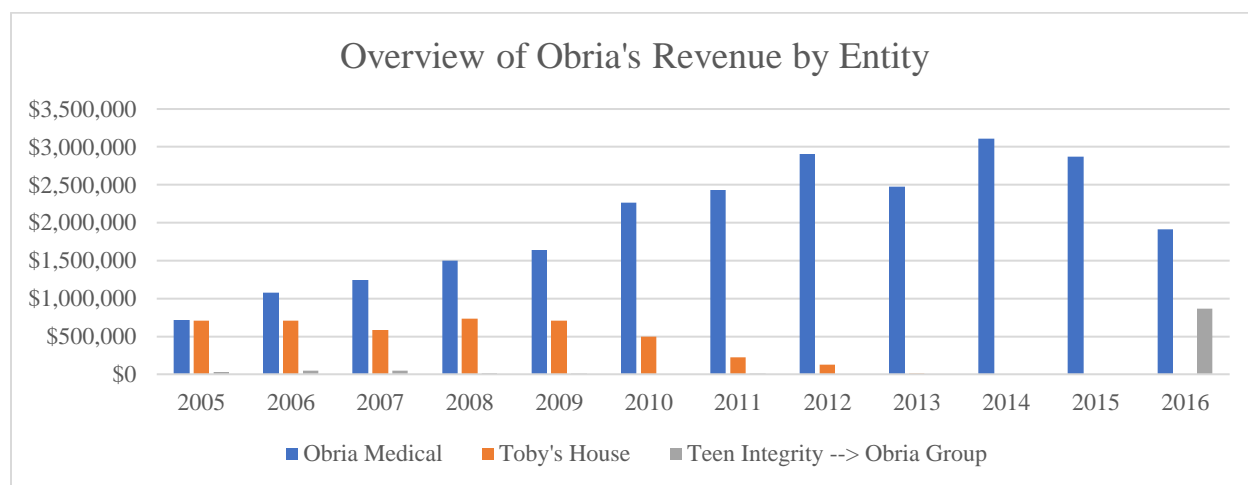
<sup>156</sup> <https://web.archive.org/web/20111106233704/http://www.bchcdonor.org/about/locations.html>.

<sup>157</sup> 2007 Return of Organization Exempt from Income Tax, Form 990, National Christian Charitable Foundation, Inc., filed Aug. 15, 2008, available at [990s.foundationcenter.org/990\\_pdf\\_archive/581/581493949/581493949\\_200712\\_990.pdf](https://www.foundationcenter.org/990_pdf_archive/581/581493949/581493949_200712_990.pdf); 2008 Return of Organization Exempt from Income Tax, Form 990, National Christian Charitable Foundation, Inc., available at [990s.foundationcenter.org/990\\_pdf\\_archive/581/581493949/581493949\\_200812\\_990.pdf](https://www.foundationcenter.org/990_pdf_archive/581/581493949/581493949_200812_990.pdf); 2009 Return of Organization Exempt from Income Tax, Form 990, National Christian Charitable Foundation, Inc., available at [990s.foundationcenter.org/990\\_pdf\\_archive/581/581493949/581493949\\_200912\\_990.pdf](https://www.foundationcenter.org/990_pdf_archive/581/581493949/581493949_200912_990.pdf).

<sup>158</sup> 2008 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., filed Aug. 11, 2010, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2010\\_09\\_EO%2F33-0150193\\_990\\_200909](https://projects.propublica.org/nonprofits/display_990/330150193/2010_09_EO%2F33-0150193_990_200909).

for the new ultrasound machines for its clinics.<sup>159</sup> Then in 2012, Obria Medical Clinics received a combined \$381,625 from Catholic institutions including \$250,000 from the U.S. Conference of Catholic Bishops (“Bishops”).<sup>160</sup> The Bishops donated another \$250,000 in 2013.<sup>161</sup> As noted above, while Obria was increasing its reliance on religious funders, it also continued to receive funding from the Orange County Board of Supervisors.

In 2014, the Bishops gave \$750,000 to Obria Medical Clinics, or about 25 percent of the total revenue the organization received that year.<sup>162</sup> Obria Medical Clinics, apparently, used some of those funds to pay Ms. Bravo’s husband. The organization reported on its 2014 tax filing that Obria paid \$76,809 to Bravo Builders, a company owned by Ms. Bravo’s husband, for a “remodel” and “build out.”<sup>163</sup> This was not the first time that Obria paid money to an organization affiliated with the charity. From 2009 to 2011, Obria paid nearly \$6,000 in legal fees to the Alvarez Law Firm, a law firm run by one of Obria’s board members, Justin Alvarez.<sup>164</sup> Generally, nonprofits are discouraged from compensating their board members or any entities associated with their board members.<sup>165</sup>



<sup>159</sup> [https://groups.google.com/forum/#!topic/crhp\\_w6/m02zliz5LRU](https://groups.google.com/forum/#!topic/crhp_w6/m02zliz5LRU).

<sup>160</sup> 2012 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., prepared Oct. 23, 2014 available at <https://www.documentcloud.org/documents/5836501-Birth-Choice-Pregnancy-Centers-2012-990-Self.html>.

<sup>161</sup> 2015 Return of Organization Exempt from Income Tax, Form 990, Obria Medical Clinics of Southern California, Inc., prepared May 4, 2017, available at <http://www.guidestar.org/ViewEdoc.aspx?eDocId=4867387&approved=True>.

<sup>162</sup> *Id.*; 2014 Return of Organization Exempt from Income Tax, Form 990, Obria Medical Clinics of Southern California, Inc., filed May 13, 2016, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2016\\_08\\_EO%2F33-0150193\\_990\\_201509](https://projects.propublica.org/nonprofits/display_990/330150193/2016_08_EO%2F33-0150193_990_201509).

<sup>163</sup> *Id.*

<sup>164</sup> 2009 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., filed Aug. 11, 2011, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2012\\_01\\_EO%2F33-0150193\\_990\\_201009](https://projects.propublica.org/nonprofits/display_990/330150193/2012_01_EO%2F33-0150193_990_201009); 2010 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., filed May 24, 2012, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2012\\_06\\_EO%2F33-0150193\\_990\\_201109](https://projects.propublica.org/nonprofits/display_990/330150193/2012_06_EO%2F33-0150193_990_201109); 2011 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., filed Aug. 9, 2013, available at [https://projects.propublica.org/nonprofits/display\\_990/330150193/2013\\_11\\_EO%2F33-0150193\\_990\\_201209](https://projects.propublica.org/nonprofits/display_990/330150193/2013_11_EO%2F33-0150193_990_201209); <https://www.alvarezfirm.com/jalvarez.php>.

<sup>165</sup> <https://www.councilofnonprofits.org/tools-resources/can-board-members-be-paid>.

Notably, Obria announced in 2014 its intention to become to a national umbrella network for CPCs.<sup>166</sup> A May 2014 memo included in a flyer from Obria’s PR firm, the Barnabas Group, described the initiative as a “Big Holy Audacious Goal” to open 200 medical clinics within five years.<sup>167</sup> The \$750,000 donation from the Bishops was the first part of a five-year, \$2.5 million contribution to achieve its goal of launching a “national pro-life, faith-based business model of full-service licensed medical clinics under a new brand.”<sup>168</sup> At the time of the announcement, Obria had just 19 full time staffers and 8 part time employees.<sup>169</sup> An internal memo available on Obria’s old website indicates Obria began planning for the transition in 2012.<sup>170</sup>

## Section VI: The Obria Group’s Affiliates

Today, Obria is far short of its goal of 200 clinics. Notably, Ms. Bravo continues to reinterpret the past: the Obria Group’s current website states that the goal is to sign up 200 clinics by 2020, but she originally promised to complete the goal within five years when she announced it in 2014.<sup>171</sup> To make up for this shortcoming, Obria recently launched a \$240 million capital campaign to recruit more affiliate clinics.<sup>172</sup>

Obria claims that it has more than 30 affiliate clinics including the clinics operating under the name of Obria Medical Clinics of Southern California.<sup>173</sup> Like many of Obria’s claims, though, this number varies widely based on where it appears. For instance, Ms. Bravo claims Obria has 36 affiliates in her biography on one of the Obria Group’s websites.<sup>174</sup> In a 2018 email to supporters, Ms. Bravo said Obria had signed up 38 affiliate clinics.<sup>175</sup> Yet another recent update to the Obria Group’s website states that they have 21 affiliate clinics and 11 mobile units operating for a total of 32.<sup>176</sup> Whether Obria has 32 or 38 clinics, the organization is still far

<sup>166</sup> Kate O’Hare, *Kathleen Eaton Bravo Changes Course for Pro-Life BirthChoice*, *CatholicVote*, Nov. 12, 2014, available at <https://www.catholicvote.org/kathleen-eaton-bravo-changes-course-for-pro-life-birthchoice/>; Press Release, *Catholic Campaign for Human Development Awards \$2.5 Million to Birth Choice Health Clinics*, *Birth Choice Health Clinics*, July 8, 2014, available at <https://www.marketwatch.com/press-release/catholic-campaign-for-human-development-awards-25-million-to-birth-choice-health-clinics-2014-07-08>.

<sup>167</sup> <http://sandiego.barnabasgroup.org/wp-content/uploads/2017/03/SD-August-2015-Handout.pdf>.

<sup>168</sup> Press Release, *Catholic Campaign for Human Development Awards \$2.5 Million to Birth Choice Health Clinics*, *Birth Choice Health Clinics*, July 8, 2014, available at <https://www.marketwatch.com/press-release/catholic-campaign-for-human-development-awards-25-million-to-birth-choice-health-clinics-2014-07-08>.

<sup>169</sup> <http://sandiego.barnabasgroup.org/wp-content/uploads/2017/03/SD-August-2015-Handout.pdf>.

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[https://web.archive.org/web/20150101035305/http://www.bchcdonor.org/literature\\_94743/ProLife\\_Medical\\_Model\\_Book](https://web.archive.org/web/20150101035305/http://www.bchcdonor.org/literature_94743/ProLife_Medical_Model_Book).

<sup>171</sup> <https://obriagroup.org/about/>; <http://sandiego.barnabasgroup.org/wp-content/uploads/2017/03/SD-August-2015-Handout.pdf>; <http://orangecounty.barnabasgroup.org/wp-content/uploads/2018/07/Orange-County-February-2016-Handout.pdf>.

<sup>172</sup> Sarah Varney, ‘Contraception Deserts’ Will Probably Get Worse If Trump’s Birth Control Changes Go Through, *Kaiser Health News*, Oct. 1, 2018, available at [https://tonic.vice.com/en\\_us/article/vbnzxx/contraception-deserts-title-x-family-planning-grants](https://tonic.vice.com/en_us/article/vbnzxx/contraception-deserts-title-x-family-planning-grants).

<sup>173</sup> <https://obriagroup.org/affiliation/>.

<sup>174</sup> <https://obriagroup.org/about/>.

<sup>175</sup> Email from Kathleen Eaton Bravo to Supporters, Aug. 2, 2018, attached as Exhibit 1 to Plaintiffs’ Motion for Leave to Supplement the Administrative Record, *Arizona Family Health Partnership et al v. United States Department of Health and Human Services*, No. 1:18-cv-02581, (D.C. Nov. 8, 2018).

<sup>176</sup> <https://obriagroup.org/title-x-announcement/>.

short of the 200 Ms. Bravo promised, and the number of the affiliates appears to be decreasing rather than increasing.

Legally, Obria appears to use the 501(c)(3), the Obria Group, as its entity for the national umbrella organization, and the other 501(c)(3), Obria Medical Clinics of Southern California, as one of its affiliate networks. Obria appears to use the domain names obria.org and obriagroup.org for the national entity, and omcsocal.org for the Obria Medical Clinics of Southern California entity. Beyond its own CPC network, Obria claims that it has affiliates operating in California, Georgia, Iowa, Oregon, and Washington.<sup>177</sup> In addition to these official affiliates, Obria appears to have loose ties to other clinics including the Lestonnac Free Clinic, the Hurtt Family Health Clinic, and the Guiding Star Project.<sup>178</sup> Ms. Bravo calls this loose affiliation the “collaboration model.”<sup>179</sup>

Notably, the Lestonnac Free Clinic has relied on questionable figures to provide medical services.<sup>180</sup> One doctor was released from prison after being convicted of Medicare fraud, but he was allowed to continue to practice medicine because of his work for Lestonnac.<sup>181</sup> The judge in the case said that the doctor’s volunteer work for Lestonnac demonstrated his commitment to helping the local indigent population and was worthy of maintaining his license.<sup>182</sup>

### **Obria Medical Clinics of Southern California**

Like Obria’s other history, its claim that Obria Medical Clinics of Southern California has operated six clinics has fluctuated over time. Currently, the website for Obria Medical Clinics of Southern California lists only three clinic locations and a mobile clinic.<sup>183</sup> Ms. Bravo’s biography on the Obria Group website states that Obria Medical Clinics of Southern California was operating six clinics by 2006 while its old website states that the organization opened its sixth clinic in 2010.<sup>184</sup> When Obria announced its new name in 2015, it claimed

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<sup>177</sup> Obria’s application for Title X funding states that they have affiliates in Texas, but CfA was unable to locate any Obria affiliates in Texas. See <https://www.documentcloud.org/documents/5778579-Obria-TitleX.html>, pg 13. Obria’s website indicates Obria has three affiliate clinics in Oklahoma, but CfA was unable to locate any affiliates in Oklahoma. See <https://obriagroup.org/affiliation/>.

<sup>178</sup> <https://obriagroup.org/title-x-announcement/>; Press Release, *Birth Choice Joins Primary Care Clinics Through Medical Collaboration Model, Bringing Comprehensive Health Services to Underserved Communities*, *Birth Choice Health Clinics*, Oct. 27, 2014, available at <http://www.marketwired.com/press-release/birth-choice-joins-primary-care-clinics-through-medical-collaboration-model-bringing-1961350.htm>; Press Release, *The Obria Foundation and Guiding Star Project Partner to Deliver High-Quality Holistic Healthcare to Under-Served Communities*, *Obria Foundation*, Dec. 9, 2015, available at <http://www.marketwired.com/press-release/obria-foundation-guiding-star-project-partner-deliver-high-quality-holistic-healthcare-2080740.htm>.

<sup>179</sup> Kate O’Hare, *Kathleen Eaton Bravo Changes Course for Pro-Life BirthChoice*, *CatholicVote*, Nov. 12, 2014, available at <https://www.catholicvote.org/kathleen-eaton-bravo-changes-course-for-pro-life-birthchoice/>.

<sup>180</sup> Lanie Jones, *Physician is Accused by State of Malpractice*, *Los Angeles Times*, July 11, 1990.

<sup>181</sup> Justin Petrucci, *Local Oncologist Guilty of Medicare Fraud Will Keep License*, *Patch*, Mar. 22, 2012, available at <https://patch.com/california/fountainvalley/state-medical-board-agrees-not-to-revoke-license-of-1009e5c4ac3>.

<sup>182</sup> *Id.*

<sup>183</sup> <https://omcsocal.org/>.

<sup>184</sup> <https://obriagroup.org/about/>.

Obria Medical Clinics of Southern California had six clinics at that time.<sup>185</sup> Meanwhile, an email from two years later indicated Obria Medical Clinics of Southern California was operating four clinics and mobile clinic at that time.<sup>186</sup> Yet another claim, nine clinics, appears on Ms. Bravo's LinkedIn page, which appears to have been written in 2014.<sup>187</sup>

Whatever the number of locations, Obria Medical Clinics of Southern California is the present incarnation of the CPC that Ms. Bravo took over in the 1980s. Today, Obria Medical Clinics of Southern California raises nearly \$2 million in annual revenue.<sup>188</sup> Like its other affiliate clinics, Obria Medical Clinics of Southern California claims it has medical licenses for its locations and that it provides some specific medical services like ultrasounds. According to its website:

Obria Medical Clinics of Southern California employ doctors, nurse practitioners, registered nurses to operate AAAHC-accredited and licensed health centers. Our services include pregnancy tests, ultrasounds, STD testing and treatment, HIV testing, prenatal care, and well-woman exams.

Additionally, we offer free parenting classes for new mothers and fathers, health education, and community resource referrals to meet the immediate needs of our patients, many of whom are poor and lack access to high-quality healthcare.<sup>189</sup>

### *Services Provided*

Notably, Obria Medical Clinics does not offer any form of contraception.<sup>190</sup> In addition to certain legitimate healthcare services, Obria also provides what it calls the abortion pill reversal, which allegedly enables a woman to counteract a medicinal abortion. Obria states on its website that it began offering this unscientific option to its clients in 2015.<sup>191</sup> Obria instructs interested parties to take the abortion reversal pill immediately after taking the first pill required in a two-pill regimen for a medical abortion. Medical experts have been intensely critical of the

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<sup>185</sup> Press Release, *Birth Choice Health Clinics Announces Transition to Obria Medical Clinics and Plans for Expansion*, *Birth Choice Health Clinics*, Mar. 17, 2015, available at <http://www.marketwired.com/press-release/birth-choice-health-clinics-announces-transition-obria-medical-clinics-plans-expansion-2001188.htm>.

<sup>186</sup> Email from Clare Venegas, President of Obria Medical Clinics, to Steven Valentine and David Mansdoerfer, Aug. 2, 2017, attached as Exhibit O to Plaintiffs' Reply in Support of Motion for Preliminary Injunction and Opposition to Defendants' Motion to Dismiss or Motion for Summary Judgement, *Planned Parenthood of Greater Washington and North Idaho et al v. US Department of Health and Human Services et al*, No: 2:2018cv00055 (E.D. Wash. Feb. 15, 2018).

<sup>187</sup> <https://www.linkedin.com/in/kathleen-eaton-bravo-8281027/>.

<sup>188</sup> 2016 Return of Organization Exempt From Income Tax, Form 990, Obria Medical Clinics of Southern California, Inc., filed Oct. 23, 2018, available at <https://www.documentcloud.org/documents/5912397-Obria-Medical-Clinics-2016-990.html>.

<sup>189</sup> <https://omcsocal.org/aboutus>.

<sup>190</sup> Sarah Varney, 'Contraception Deserts' Will Probably Get Worse If Trump's Birth Control Changes Go Through, *Kaiser Health News*, Oct. 1, 2018, available at [https://tonic.vice.com/en\\_us/article/vbnzxx/contraception-deserts-title-x-family-planning-grants](https://tonic.vice.com/en_us/article/vbnzxx/contraception-deserts-title-x-family-planning-grants).

<sup>191</sup> <https://omcsocal.org/news>.

abortion pill reversal, arguing it is not based on science, and there are no medical studies supporting its efficacy or safety.<sup>192</sup>

In addition to providing services directly, Obria also operates a smartphone app, Obria Direct, to provide telemedicine services to its clients.<sup>193</sup> Obria said it created the app as a response to Planned Parenthood's app, which provides information regarding family planning services and allows users to schedule appointments.<sup>194</sup> While Obria advertises the app as an option for telemedicine services, the app itself states that the telemedicine features are "coming soon."<sup>195</sup>

**"The Obria Medical Clinic Services are not a substitute for a formal consultation with a medical doctor or other qualified health care provider."**

At this time, the app only allows clients to schedule in-person exams at Obria's clinics.<sup>196</sup> Obria says the app offers a "nurse chat," but the End User License Agreement admits that Obria does not provide medical services:

#### NOT MEDICAL CARE AND ADVICE

Any information or content appearing within the Mobile App including any posted questions and answers, are for information purposes only and do not constitute medical advice or create a physician-patient relationship. Any information or answers to your health questions that our nurses provide are based on general healthcare information and protocols and the relevant information that you provide to them; they are not intended to be medical care or to create an ongoing professional health care relationship. The Obria Medical Clinic Services are not a substitute for a formal consultation with a medical doctor or other qualified health care provider, which we urge you to seek for any of your medical conditions. We do not provide medical opinions or diagnoses regarding your medical condition or any medical treatment or prescriptions that only a medical doctor can provide, through the Mobile App. You should always consult your medical doctor regarding the specifics of your case. Reliance on any information that we provided is solely at your own risk.<sup>197</sup>

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<sup>192</sup> Mara Gordon, *Controversial 'Abortion Reversal' Regimen Is Put To The Test*, NPR, Mar. 22, 2019, available at <https://www.npr.org/sections/health-shots/2019/03/22/688783130/controversial-abortion-reversal-regimen-is-put-to-the-test>; Ruth Graham, *Abortion Reversal Seems Possible. We Still Shouldn't Promote It.*, Slate, Apr. 5, 2018, available at <https://slate.com/technology/2018/04/abortion-reversal-seems-possible-but-we-shouldnt-promote-it.html>.

<sup>193</sup> <https://itunes.apple.com/us/app/obria-direct/id1093993377?mt=8>.

<sup>194</sup> Rachel del Guidice, *HHS Makes \$5.1 Million Grant to Pro-Life Community Clinics*, *The Daily Signal*, Mar. 29, 2019, available at <https://www.dailysignal.com/2019/03/29/exclusive-hhs-grant-set-for-pro-life-community-clinics/>.

<sup>195</sup> <https://itunes.apple.com/us/app/obria-direct/id1093993377?mt=8>.

<sup>196</sup> <https://obriagroup.org/about/>.

<sup>197</sup> The End User License Agreement can be accessed after opening the app. See <https://itunes.apple.com/us/app/obria-direct/id1093993377?mt=8>.

### *Medicaid Patients*

According to data submitted to California's Medicaid program, MediCal, Obria Medical Clinics of Southern California serves very few Medicaid patients. For instance, Obria's Long Beach clinic served fewer than 11 MediCal patients during the entire year of 2016.<sup>198</sup> Additionally, two of Obria's clinics did not report serving any Medicaid patients from 2015 to 2017 despite filing the required paperwork with the national agency that tracks Medicaid providers. The MediCal data indicates that Obria provides some services like pregnancy tests and general prenatal care that are not reimbursed through Medicaid.

### *Advertising*

In addition to its app, Obria Medical Clinics of Southern California also spends a substantial portion of its budget on advertising. Between 2001 and 2016, Obria Medical Clinics of Southern California spent a combined \$3.1 million on advertising. CPCs often spend much of their budgets buying ads, especially on search engines like Google, to convince pregnant women to visit their centers.<sup>199</sup> An internal memo available on Obria's old website, when it was still named Birth Choice Health Clinics ("BCHC"), details how the organization used search engines to mislead women:

Birth Choice Health Clinics will also be hiring an agency who specializes in search engine optimization to work in conjunction with the website designer to incorporate search engine optimization in order to give BCHC yet another advantage in the search engine space through organic search results – where the majority of people click. While BCHC is undergoing a website re-design, this agency will work with the website designer to help create a content strategy for optimum visibility. They will do this by conducting keyword research, content editing, establishing inbound links and ongoing social media monitoring. This will allow BCHC to optimize for terms that pay per click (PPC) will not allow, strategically communicate with our target market, but most importantly enable BCHC to claim and own our brand online.<sup>200</sup>

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<sup>198</sup> CfA obtained this information through an open records request to the California Department of Health Care Services. See Email from Donna Lagarias, Research Scientist at the California Department of Health Care Services, to Julia Long and Alice Huling, Campaign for Accountability, April 12, 2019, available at <https://www.documentcloud.org/documents/5993925-Email-From-Donna-Lagarias-to-Julia-Long-and.html>.

<sup>199</sup> Alice Hines, *Beware Google Ads for 'Abortion Consultations'*, *Bloomberg*, Mar. 24, 2017, available at <https://www.bloomberg.com/news/articles/2017-03-24/beware-google-ads-for-abortion-consultations>.

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[https://web.archive.org/web/20150101035305/http://www.bchcdonor.org/literature/94743/ProLife\\_Medical\\_Model\\_Book](https://web.archive.org/web/20150101035305/http://www.bchcdonor.org/literature/94743/ProLife_Medical_Model_Book).

In its 2016 financial statements, available on GuideStar, Obria said that it spent more than \$72,000 on search engine optimization alone and labeled the expense as “medical and counseling.”<sup>201</sup>

In addition to spending its own funds on advertising, Obria has received more than \$150,000 worth of free advertising from Google through the company’s ad grant program for nonprofits.<sup>202</sup> Obria’s advertising on Google, like other CPCs, has been criticized for misleading women.<sup>203</sup> Press reports and activists have demonstrated that women searching on Google for clinics that provide abortion services are instead misdirected to CPCs like Obria.<sup>204</sup>

### *Funding*

Before March 2019, Obria Medical Clinics of Southern California was funded largely through private donations and received 98 percent of its funding from “pro-life Christian families and foundations” according to an internal email.<sup>205</sup> In fiscal year 2018, the Obria Group submitted its first Title X applications for federal funding from HHS.<sup>206</sup> Obria’s 2018 application was denied, but the organization tried to use its political connections to influence HHS officials.<sup>207</sup>

Emails released as a part of a lawsuit reveal that Obria Medical Clinics of Southern California contacted HHS officials about securing federal funding. In August 2017, David Mansdoerfer, the Director for Boards and Commissions within HHS’s Office of the White House Liaison, connected Clare Venegas, President of Obria Medical Clinics of Southern California, with Steven Valentine, then the Associate Director for Policy in the Office of the Assistant

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<sup>201</sup> Independent Accountant’s Review Report and Financial Statements, Obria Medical Clinics of Southern California, Inc., Prepared Apr. 19, 2017, *available at* <https://www.guidestar.org/ViewEdoc.aspx?eDocId=4016404&approved=True>.

<sup>202</sup> 2015 Return of Organization Exempt from Income Tax, Form 990, Obria Medical Clinics of Southern California, May 4, 2017, *available at* <http://www.guidestar.org/ViewEdoc.aspx?eDocId=4867387&approved=True>; 2011 Return of Organization Exempt from Income Tax, Form 990, Birth Choice Pregnancy Centers, Inc., filed Aug. 9, 2013, *available at* [https://projects.propublica.org/nonprofits/display\\_990/330150193/2013\\_11\\_EO%2F33-0150193\\_990\\_201209](https://projects.propublica.org/nonprofits/display_990/330150193/2013_11_EO%2F33-0150193_990_201209); <https://www.alvarezfirm.com/jalvarez.php>; [https://web.archive.org/web/20150101035305/http://www.bchcdonor.org/literature\\_94743/Prolife\\_Medical\\_Model\\_Book](https://web.archive.org/web/20150101035305/http://www.bchcdonor.org/literature_94743/Prolife_Medical_Model_Book).

<sup>203</sup> Ethan Baron, *Google Points Abortion-seekers Toward Anti-abortion Clinics*, *East Bay Times*, Feb. 12, 2018, *available at* <https://www.eastbaytimes.com/2018/02/12/google-points-abortion-seekers-toward-anti-abortion-clinics/>.

<sup>204</sup> Robin Marty, *How Google Maps Leads Women Seeking Abortions Astray*, *Gizmodo*, Feb. 12, 2018, *available at* <https://gizmodo.com/how-google-maps-leads-women-seeking-abortions-astray-1822882758>.

<sup>205</sup> Email from Clare Venegas, President of Obria Medical Clinics, to Steven Valentine and David Mansdoerfer, Aug. 2, 2017, attached as Exhibit O to Plaintiffs’ Reply in Support of Motion for Preliminary Injunction and Opposition to Defendants’ Motion to Dismiss or Motion for Summary Judgement, *Planned Parenthood of Greater Washington and North Idaho et al v. US Department of Health and Human Services et al*, No: 2:2018cv00055 (E.D. Wash. Feb. 15, 2018).

<sup>206</sup> <https://www.acf.hhs.gov/fysb/title-v-competitive-sexual-risk-avoidance-education-srae-grantees-fy2018>; Victoria Colliver, *Anti-abortion Clinics Tapping into Federal Funds under Trump*, *Politico*, Dec. 16 2018, *available at* <https://www.politico.com/story/2018/12/16/abortion-pregnancy-centers-planned-parenthood-1007765>.

<sup>207</sup> *Id.*

Secretary for Health.<sup>208</sup> Mr. Mansdoerfer previously worked as a Deputy Chief of Staff in Orange County, which distributed hundreds of thousands of dollars to Obria.<sup>209</sup> Mr. Valentine indicated that he planned to set up a call with Ms. Venegas to discuss “if there are any HHS grants that [Obria] might qualify for.”<sup>210</sup> On March 6, 2019, CfA filed a Freedom of Information Act (“FOIA”) lawsuit against HHS seeking all of Obria’s communications with HHS officials.<sup>211</sup> The litigation is ongoing.<sup>212</sup>

## Recruitment

Beyond its own network, Obria is trying to recruit additional affiliate clinics. Obria’s network currently includes affiliates in California, Georgia, Iowa, Oregon, and Washington. Obria has just one affiliate organization in each of the five states, and those affiliates each operate between one and five centers. To get these affiliates to sign up, Obria seeks out existing CPCs and rebrands them as Obria Medical Clinics. Obria often sets up new websites for the existing organizations, which then start identifying themselves publicly as an affiliate of Obria Medical Clinics. The organizations, though, maintain their own infrastructure. The organizations remain independent 501(c)(3)s, often with the same officially registered name they had before partnering with Obria, and they maintain their own corporate structure. The organizations affiliate with Obria largely for branding purposes while the risks and fundraising requirements are born by the local organizations.<sup>213</sup> Obria tends to partner with groups that have already received some sort of medical accreditation. Confusingly, Obria employs the moniker Obria Medical Clinics when discussing affiliate clinics that have completely different official names.

## Iowa

Informed Choice of Iowa, for instance, was set up in 2007 as a CPC in Iowa City, Iowa.<sup>214</sup> During the following decade, the CPC slowly expanded its operations throughout the state and now operates five offices. By April 2017, the organization claimed on its website to have received accreditation from Accreditation Association for Ambulatory Health Care, Inc.<sup>215</sup>

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<sup>208</sup> <https://www.linkedin.com/in/steven-valentine-64929910/>; Email from Clare Venegas, President of Obria Medical Clinics, to Steven Valentine and David Mansdoerfer, Aug. 2, 2017, attached as Exhibit O to Plaintiffs’ Reply in Support of Motion for Preliminary Injunction and Opposition to Defendants’ Motion to Dismiss or Motion for Summary Judgement, *Planned Parenthood of Greater Washington and North Idaho et al v. US Department of Health and Human Services et al*, No: 2:2018cv00055 (E.D. Wash. Feb. 15, 2018).

<sup>209</sup> <https://projects.propublica.org/trump-town/staffers/david-paul-mansdoerfer>.

<sup>210</sup> *Id.*

<sup>211</sup> Press Release, *Watchdog Files Two Lawsuits Against HHS Seeking Records Regarding Administration’s Efforts to Roll Back Funding for Comprehensive Family Planning*, *Campaign for Accountability*, Mar. 6, 2019, available at <https://campaignforaccountability.org/watchdog-files-two-lawsuits-against-hhs-seeking-records-regarding-administrations-efforts-to-roll-back-funding-for-comprehensive-family-planning/>;

<sup>212</sup> *Campaign for Accountability v. HHS*, Case No. 1:19-cv-00624-APM.

<sup>213</sup> [https://obriagroup.org/wp-content/uploads/Affiliate\\_Compatibility\\_Evaluation\\_5-10-17.pdf](https://obriagroup.org/wp-content/uploads/Affiliate_Compatibility_Evaluation_5-10-17.pdf).

<sup>214</sup> <http://www.informedchoiceia.org/about/>.

<sup>215</sup> <https://web.archive.org/web/20170419212639/http://www.informedchoiceia.org:80/about>.

Following this expansion, the CPC became affiliated with Obria in 2017.<sup>216</sup> Today, the organization's website looks like a branded Obria Medical Clinics website.<sup>217</sup>

## California

In California, Obria partners with two other organizations that operate their own networks of CPCs. Obria's own clinics are all based in the Los Angeles area.<sup>218</sup> One of Obria's California partners, Whittier Pregnancy Care Clinic, also has locations near Los Angeles.<sup>219</sup> Whittier, though, exists only on paper.<sup>220</sup> Today, Whittier's clinics are completely branded as Obria, and all of its public facing materials employ the Obria brand name. Obria appears to have taken over Whittier in March 2018, when they set up a new website for Whittier.<sup>221</sup>

Obria's other California partner is RealOptions, which has four clinics located near San Jose.<sup>222</sup> This CPC has maintained a little more independence from Obria and still operates its own website.<sup>223</sup> RealOptions, like Whittier, also maintains its own 501(c)(3) status and files as an independent corporation with the California Secretary of State.<sup>224</sup> RealOptions was formed in 2016 following the merger of two other 501c3s, and two years later became affiliated with Obria.<sup>225</sup> It is doubtful whether someone searching for an Obria clinic on Obria's website would be aware of any of these distinctions between Obria's own and affiliated clinics since both the Whittier and RealOptions centers are largely branded as Obria Medical Clinics.<sup>226</sup>

## Georgia

On the other side of the country in Georgia, in 2017 Obria took over and rebranded a CPC that was previously known as Pregnancy Resource Center of Gwinnett ("PRCG").<sup>227</sup> The CPC, based in Lawrenceville, Georgia, claims that it was founded in 1991, but it filed its first

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<sup>216</sup> <https://web.archive.org/web/20180614030527/https://www.informedchoicesclinic.com/>.

<sup>217</sup> <https://www.informedchoicesclinic.com/>.

<sup>218</sup> <https://omcsocal.org/>.

<sup>219</sup> <https://www.obriala.org/>; <https://www.wpcchampions.org/>.

<sup>220</sup> 2017 Return of Exempt Organization From Income Tax, Form 990, Whittier Pregnancy Care Clinic, filed Nov. 14, 2018, *available at*

<https://projects.propublica.org/nonprofits/organizations/954305452/201803189349311425/IRS990>; 2018 Statement of Information, Whittier Pregnancy Care Clinic, Inc., California Secretary of State, filed Nov. 15, 2018, *available at* <https://www.documentcloud.org/documents/5944232-Whittier-Pregnancy-Care-Clinic-2018-Annual-Report.html>.

<sup>221</sup> <https://whois.icann.org/en/lookup?name=wpcchampions.org> <https://www.wpcchampions.org/>.

<sup>222</sup> <https://www.realoptions.net/>.

<sup>223</sup> *Id.*

<sup>224</sup> 2017 Return of Exempt Organization From Income Tax, Form 990, Real Options Pregnancy Medical Clinics Crisis Pregnancy Ctrs of Santa Clara Cnt, filed Nov. 6, 2018, *available at*

<https://projects.propublica.org/nonprofits/organizations/942820673/201823129349302022/IRS990>; 2016 Statement of Information, RealOptions, California Secretary of State, filed June 30, 2016, *available at* <https://businesssearch.sos.ca.gov/Document/RetrievePDF?Id=01113789-20952199>;

<sup>225</sup> Merger Agreement, RealOptions, California Secretary of State, filed Jan. 15, 2016, *available at* <https://businesssearch.sos.ca.gov/Document/RetrievePDF?Id=01113789-20230435>.

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<https://locator.obria.org/?search=los%20angeles,%20ca&selected=Los%20Angeles,%20CA,%20USA&lat=34.0522342&lng=-118.2436849>.

<sup>227</sup> <https://www.obria.org/locations/lawrenceville-ga/>.

registration with the Georgia Secretary of State's office in 2014.<sup>228</sup> While Obria's website for the clinic highlights its purported three decades of history, the clinic only received its 501c3 status in 2015.<sup>229</sup> The official name for the clinic is still Pregnancy Resource Center of Gwinnett.<sup>230</sup> The CPC has not filed any name change with the Georgia Secretary of State's office or changed its name on its tax forms filed with the Internal Revenue Service, but all of its marketing materials make clear that the clinic is a part of Obria.<sup>231</sup>

Obria appears to have taken over the clinic in late 2017. The Obria website for the clinic, supportomcg.org, was created on December 15, 2017.<sup>232</sup> The corresponding annual tax form covering the period from July 1, 2017 to June 30, 2018, discloses for the first time that PRCG was employing the Obria name for its clinics.<sup>233</sup> Both of the organization's previous websites now redirect to the new Obria site, and a disclosure available on one of the previous websites states that Obria, not PRCG, now owns the website.<sup>234</sup>

### *Abstinence Education Program*

Obria's relationship with PRCG is notable because the CPC operates an abstinence education program, previously called the IMPACT program, that has been the subject of numerous complaints from students.<sup>235</sup> In 2018, the *HuffPost* published an op-ed recounting the lies and inaccuracies that PRCG employs in teaching abstinence education in Georgia's public schools.<sup>236</sup> The op-ed included a description of one student's experience:

She was taught that birth control doesn't work... that if she had sex before marriage, she would regret it for the rest of her life and would no longer have the same value to a future spouse. No one would want her.

And:

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<sup>228</sup> Certificate of Incorporation, Pregnancy Resources of Gwinnett, Inc. filed Feb. 7, 2014, Georgia Secretary of State, available at <https://ecorp.sos.ga.gov/BusinessSearch/DownloadFile?filingNo=1362220>; <https://supportomcg.org/about/>.

<sup>229</sup> Pregnancy Resource Center of Gwinnett, Inc. IRS Determination Letter, Aug. 12, 2015, Internal Revenue Service, available at [https://apps.irs.gov/pub/epostcard/dl/FinalLetter\\_46-5456475\\_PREGNANCYRESOURCECENTEROFGWINNETTINC\\_06092015.tif](https://apps.irs.gov/pub/epostcard/dl/FinalLetter_46-5456475_PREGNANCYRESOURCECENTEROFGWINNETTINC_06092015.tif).

<sup>230</sup> Annual Registration, Pregnancy Resource Center of Gwinnett, Inc., filed Jan. 23, 2019, Georgia Secretary of State, available at <https://ecorp.sos.ga.gov/BusinessSearch/DownloadFile?filingNo=16523293>.

<sup>231</sup> <https://projects.propublica.org/nonprofits/organizations/465456475>; Business Search, Corporations Division, Georgia Secretary of State, accessed at <https://ecorp.sos.ga.gov/BusinessSearch/>; <https://supportomcg.org/about/>.  
<sup>232</sup> <https://whois.icann.org/en/lookup?name=supportomcg.org>.

<sup>233</sup> 2017 Return of Organization Exempt From Income Tax, Form 990, Pregnancy Resource Center of Gwinnett, Prepared Jan. 24, 2019, available at <http://www.guidestar.org/ViewEdoc.aspx?eDocId=4851786&approved=True>.

<sup>234</sup> [https://www.prcfgwinnett.com/wp-content/uploads/2017/11/2017.10.31\\_Final\\_Terms-of-Use\\_PRC-Gwinnett.pdf](https://www.prcfgwinnett.com/wp-content/uploads/2017/11/2017.10.31_Final_Terms-of-Use_PRC-Gwinnett.pdf); <https://web.archive.org/web/20161117001911/http://prcfgwinnett.com/>; <http://prcg.org>, <http://prcfgwinnett.com>.

<sup>235</sup> <https://web.archive.org/web/20160316004656/http://prcg.org/impact-program/>.

<sup>236</sup> Jaime Winfree and Andrea Swartzendruber, Is A Crisis Pregnancy Center Teaching Sex Ed At Your Kid's School?, *HuffPost*, Apr. 24, 2018, available at [https://www.huffpost.com/entry/opinion-winfree-swartzendruber-crisis-pregnancy-sex-ed\\_n\\_5ade8087e4b0b2e81132895d](https://www.huffpost.com/entry/opinion-winfree-swartzendruber-crisis-pregnancy-sex-ed_n_5ade8087e4b0b2e81132895d).

In one exercise...the instructor gave each student a piece of individually wrapped candy and told them to suck on it and place it back in the wrapper. She then collected all of the candy and asked who wanted one, likening the spit-out candy to a girl who has had sex with multiple partners. “If you think that’s gross, imagine it’s someone’s vagina,” quipped the instructor.<sup>237</sup>

Many students also submitted complaints about PRCG’s IMPACT program:

Abstinence-only education was extremely damaging to me and many of my peers. Because of this, many of us did not recognize the importance of birth control and basic barrier methods for STD protection, and this led to issues down the road. Many of our classmates were pregnant in high school. Many had abortions. Many had more than one.

And:

I was assaulted weekly by a peer... my attacker made sure I knew I was worthless, used and unlovable. I found that message reinforced by activities in sex education in Gwinnett County.<sup>238</sup>

At a 2017 board meeting for Gwinnett County Public Schools, two dozen students and parents complained directly to the board about PRCG.<sup>239</sup> Shortly after the board meeting, PRCG’s Executive Director, Robin Mauck, wrote an email to teachers at the school questioning the veracity of complaints about one of the program’s teachers. Specifically, Ms. Mauck asked about the accuracy of a Facebook post recounting certain statements:

“If she didn't drink, she wouldn't get raped.”  
“People get pregnant for attention these days.”  
“If you think it's bad to put a piece of candy in your mouth after someone, imagine someone's vagina. Where were your mouths last night.”

And:

Saying that no one else wants you after you have been used.<sup>240</sup>

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<sup>237</sup> *Id.*

<sup>238</sup> *Id.*

<sup>239</sup> Eric Sturgis, *Sex Ed Complaints Arise Again, This Time in Gwinnett*, *Atlanta Journal Constitution*, June 21, 2017, available at <https://www.ajc.com/news/local-education/sex-complaints-arise-again-this-time-gwinnett/EMhhYMFFsQ1f6vA0BcZNOO/>.

<sup>240</sup> CfA received documents regarding the program from the Gwinnett County Public Schools in response to a Georgia Open Records request. See Email from Robin Mauck, Executive Director, Obria Medical Clinics, to Tasha Guadalupe, Ph.D., Health and Physical Education Director, Gwinnett County Public Schools, June 19, 2017, available at <https://www.documentcloud.org/documents/5956041-Email-from-Robin-Mauck-to-Tasha-Guadalupe.html>.

Ms. Mauck's email to school officials, which CfA obtained through an open records request, asked whether the instructor had said these inflammatory statements.<sup>241</sup> The teachers sitting in on the class said they could not remember whether the instructor had used the questionable language.<sup>242</sup>

PRCG has continued its abstinence only education initiatives since affiliating with Obria. Recently, PRCG rebranded the IMPACT program as the Empowered program and documents obtained by CfA show that Ms. Mauck applied for new funding from the Gwinnett County Public School district's Community Health Education Advisory Committee for the 2019-2020 school year.<sup>243</sup> An email from November 2018 shows the Committee recommended that the school board accept the Empowered program at the high school level, and minutes from the school board's February 21, 2019 meeting indicate the board approved the "supplemental materials that were approved by the committee."<sup>244</sup> PRCG, though, does not mention the IMPACT program or the Empowered program on its website or in its most recent financial statement.<sup>245</sup>

## Oregon

In Oregon, Obria partners with the Pregnancy Alternatives Center, a nonprofit, family planning organization located in Lebanon, Oregon.<sup>246</sup> On February 21, 2018, Obria registered the center with Oregon Secretary of State and listed the official name as Obria Medical Clinics - Lebanon.<sup>247</sup> The Oregon affiliate appears to have just one location in Lebanon, Oregon.<sup>248</sup>

## Washington

In Washington, Obria partners with a group called My Choices.<sup>249</sup> Obria appears to have affiliated with the organization in 2018, when it included Obria Medical Clinics PNW as an alternate name on its Charitable Organization Renewal form filed with the Washington Secretary

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<sup>241</sup> *Id.*

<sup>242</sup> *Id.*

<sup>243</sup> Email from Tasha Guadalupe, Ph.D., Health and Physical Education Director, Gwinnett County Public Schools, to Robin Mauck, Executive Director, Obria Medical Clinics, Nov. 13, 2018, *available at* <https://www.documentcloud.org/documents/5956046-Email-from-Tasha-Guadalupe-to-Robin-Mauck.html>.

<sup>244</sup> *Id.*; <http://publish.gwinnett.k12.ga.us/gcps/home/public/about/boe/meeting-summary/20190220>.

<sup>245</sup> <https://supportomcg.org/about/our-programs/>; <https://supportomcg.org/wp-content/uploads/2019/02/June-2018-Final-Financials-1.pdf>.

<sup>246</sup> See Pregnancy Alternatives Center Application for Registration, OREGON SECRETARY OF STATE, (filed Nov. 11, 1989) *available at* [http://egov.sos.state.or.us/br/pkg\\_web\\_name\\_srch\\_inq.show\\_detl?p\\_be\\_rsn=558568&p\\_srce=BR\\_INQ&p\\_print=F](http://egov.sos.state.or.us/br/pkg_web_name_srch_inq.show_detl?p_be_rsn=558568&p_srce=BR_INQ&p_print=FALSE)  
[ALSE](http://egov.sos.state.or.us/br/pkg_web_name_srch_inq.show_detl?p_be_rsn=558568&p_srce=BR_INQ&p_print=FALSE).

<sup>247</sup> See Obria Medical Clinics – Lebanon Application for Registration, OREGON SECRETARY OF STATE, (filed Feb. 21, 2018) *available at* [http://egov.sos.state.or.us/br/pkg\\_web\\_name\\_srch\\_inq.show\\_detl?p\\_be\\_rsn=1962417&p\\_srce=BR\\_INQ&p\\_print=](http://egov.sos.state.or.us/br/pkg_web_name_srch_inq.show_detl?p_be_rsn=1962417&p_srce=BR_INQ&p_print=FALSE)  
[FALSE](http://egov.sos.state.or.us/br/pkg_web_name_srch_inq.show_detl?p_be_rsn=1962417&p_srce=BR_INQ&p_print=FALSE).

<sup>248</sup> See <https://www.obria.org/locations/lebanon-or/>.

<sup>249</sup> <http://mychoices.org/>.

of State.<sup>250</sup> The organization appears to operate two offices, one in Port Angeles, Washington, and one in Sequim, Washington.<sup>251</sup>

Notably, officials at the Washington State Department of Health expressed alarm when Obria began to affiliate with clinics in Washington. After reviewing Obria's materials and website, the state's family planning experts described Obria as "slick" and "sneaky." One official concluded, "the Obria group is also all about business – capturing market share (and shhhhhh...making \$)." <sup>252</sup>

## Section VII: Obria's Pursuit of HHS Funding

After President Trump was elected and appointed anti-choice activists to influential positions within HHS, Obria started a full-press effort to obtain Title X funding. Obria applied for the program in 2018, but HHS had to reject its application because Obria does not provide any sort of hormonal birth control.<sup>253</sup> Following that rejection, Obria promised to reapply for Title X funds in 2019, intending to line up other clinics who would work with Obria to distribute contraception options.<sup>254</sup> In 2018, however, Obria Group did receive a \$450,000 Title V grant from HHS to provide abstinence only education programming, part of Title V.<sup>255</sup>

In 2019, the Obria Group submitted at least two applications for Title X funding. In an ultimately-unsuccessful application Obria planned to partner with three CPCs located in Texas, including one called the Heidi Group.<sup>256</sup> The application contained numerous errors. For instance, the grant application said that the Heidi Group serves more than 100 patients a week.<sup>257</sup> However, a Heidi Group employee who left the group in March 2019 after the application was submitted, told a reporter that the clinic only served about 8 patients on a good day or 40 per week.<sup>258</sup>

Additionally, the grant application described a different Heidi Group employee, a nurse named Ronda Schultz, as the group's "top quality assurance officer." However, according to reporting, Ms. Schultz left the Heidi Group in April 2018, approximately eight to nine months

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<sup>250</sup> My Choices, Charitable Organization Registration Renewal, Washington Secretary of State, filed Dec. 6, 2018, available at <https://www.documentcloud.org/documents/5995393-My-Choices-Obria-Charitable-Renewal-Washington.html>.

<sup>251</sup> <http://mychoices.org/partner/>.

<sup>252</sup> CfA obtained the email via an open records request to the Washington State Department of Health. See <https://www.documentcloud.org/documents/5995396-Washington-State-Department-of-Health-Email.html>.

<sup>253</sup> Victoria Colliver, *Anti-abortion Clinics Tapping into Federal Funds Under Trump*, *Politico*, Dec. 16, 2019, available at <https://www.politico.com/story/2018/12/16/abortion-pregnancy-centers-planned-parenthood-1007765>.

<sup>254</sup> *Id.*

<sup>255</sup> <https://www.acf.hhs.gov/fysb/title-v-competitive-sexual-risk-avoidance-education-srae-grantees-fy2018>.

<sup>256</sup> Jeremy Blackman, *Trouble Texas Nonprofit Tries for More Family Planning Money*, *Houston Chronicle*, Mar. 22, 2019, available at <https://www.houstonchronicle.com/news/houston-texas/houston/article/Troubled-Texas-nonprofit-tries-for-more-family-13697734.php>.

<sup>257</sup> Application for Title X Funding, The Obria Group, available at <https://www.documentcloud.org/documents/5778579-Obria-TitleX.html>.

<sup>258</sup> Jeremy Blackman, *Trouble Texas Nonprofit Tries for More Family Planning Money*, *Houston Chronicle*, Mar. 22, 2019, available at <https://www.houstonchronicle.com/news/houston-texas/houston/article/Troubled-Texas-nonprofit-tries-for-more-family-13697734.php>.

before Obria submitted the grant application.<sup>259</sup> Finally, the Obria grant application omitted any information regarding the Heidi Group's terminated state contracts or the ongoing audit of the Heidi Group's questionable \$1 million expenses in relations to its state contracts.<sup>260</sup>

Beyond errors pertaining specifically to the Heidi Group, the Texas application may have also included a bold-faced operational lie about the project. Obria said in its application for funding in Texas that its partners will provide a "broad range of family planning methods" including several contraception options.<sup>261</sup> In December 2018, *Politico* wrote about Obria's plans to include this language in its 2019 application.<sup>262</sup> Despite including the "broad range" language in its application, Obria sent an email to its supporters on January 22, 2019, claiming that *Politico* got "some of the facts wrong."<sup>263</sup> The email from Ms. Bravo states, "Obria's clinic model is committed to never provide hormonal contraception nor abortions! Obria promotes abstinence-based sexual risk avoidance education -- the most effective public health model for promoting healthy behaviors."<sup>264</sup> After further reporting by the *Houston Chronicle* confirmed that Obria's application did include provision of a broad range of contraception options, Obria spokesperson Mauricio Leone blamed the Heidi Group for the provision's inclusion. Mr. Leone stated "At no time in the grant writing process was anyone at Obria responsible for the language in question, and we would not have accepted the grant under those conditions."<sup>265</sup> It is unclear whether Obria was intending to mislead its supporters with these comments or HHS with its written application. In 2015, Ms. Bravo said, "I would close my doors" before providing contraception or abortion referrals.<sup>266</sup>

Another controversial aspect of the Texas application was that Obria was trying to obtain federal funding to cover part of Ms. Bravo's salary and parts of the salaries for two other Obria executives. The proposal said that Ms. Bravo would dedicate 20 percent of her time to the Texas project, and, therefore, 20 percent of her salary would be eligible to be paid by federal funding.<sup>267</sup> The proposal also referenced two other Obria staffers who would be paid for part of their time through federal funds.<sup>268</sup> In total, the project budget set aside \$293,157 in federal funding for Obria staff members.<sup>269</sup> The proposal also set aside nearly \$8,000 to cover Obria

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<sup>259</sup> *Id.*

<sup>260</sup> See Letter from Alice Huling, Counsel at CfA, to Diane Foley, Deputy Assistant Secretary, Department of Health and Human Services, Mar. 21, 2019, available at <https://campaignforaccountability.org/watchdog-calls-on-hhs-to-investigate-obriaheidi-group-for-lying-on-application-for-title-x-funding/>.

<sup>261</sup> Application for Title X Funding, The Obria Group, available at <https://www.documentcloud.org/documents/5778579-Obria-TitleX.html>.

<sup>262</sup> Victoria Colliver, *Anti-abortion Clinics Tapping into Federal Funds Under Trump*, *Politico*, Dec. 16, 2019, available at <https://www.politico.com/story/2018/12/16/abortion-pregnancy-centers-planned-parenthood-1007765>.

<sup>263</sup> Email from Kathleen Eaton Bravo to supporters, Jan. 22, 2019, available at <https://www.documentcloud.org/documents/5956063-Email-from-Kathleen-Bravo-to-Supporters-January.html>.

<sup>264</sup> *Id.*

<sup>265</sup> Dorothy Cummings McLean, *Pro-Life Catholic Medical Group's Title X Application Included Contraceptive Promise*, *LifeSite News*, Apr. 18, 2019, available at <https://www.lifesitenews.com/news/pro-life-catholic-medical-groups-title-x-application-included-contraceptive-promise>.

<sup>266</sup> Kelsey Bolar, *Would Women Be OK Without Planned Parenthood*, *The Daily Signal*, Aug. 3, 2015, available at <https://www.dailysignal.com/2015/08/03/would-women-be-okay-without-planned-parenthood/>.

<sup>267</sup> Application for Title X Funding, The Obria Group, available at <https://www.documentcloud.org/documents/5778579-Obria-TitleX.html>.

<sup>268</sup> *Id.*

<sup>269</sup> *Id.*

staff's travel costs to Texas.<sup>270</sup> Finally, the proposal included \$1,875 in federal funding for a board retreat. Obria was trying to recoup funding for all these expenses despite not providing a single healthcare service through its own providers in the state of Texas. HHS did not award Obria any funding for the Texas project.<sup>271</sup>

Obria also applied for Title X funding on behalf of its own clinics and affiliate clinics in California. On March 31, 2019, HHS awarded Obria \$1.7 million for fiscal year 2019 and indicated Obria is eligible to receive that amount across two additional years for a total of \$5.1 million.<sup>272</sup> To date, HHS has refused to release Obria's application for Title X funding in California.<sup>273</sup>

Obria's 2019 applications benefitted from the March 4, 2019 rule change promulgated by HHS.<sup>274</sup> While the nationwide injunction has halted the implementation of the new rule, current recipients of Title X funds, including Obria, must adhere to the previous Title X regulations. As a 2019 Title X grant recipient, Obria is required to provide non-directive abortion counseling and referrals if asked by a patient. Additionally, Obria's project must provide a broad range of medically approved family planning methods and services. When questioned, Ms. Bravo has said that despite these requirements, Obria will not provide contraception or refer for abortion.<sup>275</sup>

### Section VIII: Obria's Religious Activities

Obria is, like all CPCs, motivated by its steadfast Christian ideology, though Obria is largely grounded in specifically Catholic theology.<sup>276</sup> Obria's religious motivation is important because the group is seeking to use taxpayer dollars to provide healthcare services to low-income Americans. Obria's inherently religious agenda, however, calls into question whether the organization can deliver healthcare services in a nonsectarian manner.

Obria's religious foundation runs deep through the organization. In 2014, when Ms. Bravo announced her intention to make Obria a national organization and obtain Title X funds, *CatholicVote* described the event:

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<sup>270</sup> *Id.*

<sup>271</sup> <https://www.hhs.gov/opa/grants-and-funding/recent-grant-awards/index.html>.

<sup>272</sup> *Id.*

<sup>273</sup> Press Release, Watchdog Files Two Lawsuits Against HHS Seeking Records Regarding Administration's Efforts to Roll Back Funding for Comprehensive Family Planning, *Campaign for Accountability*, Mar. 6, 2019, available at <https://campaignforaccountability.org/watchdog-files-two-lawsuits-against-hhs-seeking-records-regarding-administrations-efforts-to-roll-back-funding-for-comprehensive-family-planning/>; *Campaign for Accountability v. HHS*, Case No. 1:19-cv-00624-APM.

<sup>274</sup> Garnet Henderson, *Anti-Choice Clinics Are Changing the Way They Operate to Qualify for Government Funding*, *Tonic*, Jan. 15, 2019, available at [https://tonic.vice.com/en\\_us/article/8xpw8b/crisis-pregnancy-centers-medical-services-government-funding](https://tonic.vice.com/en_us/article/8xpw8b/crisis-pregnancy-centers-medical-services-government-funding); Sarah McCammon, *Trump Administration Announces Sweeping Changes to Federal Family Planning Program*, *NPR*, Feb. 22, 2019, available at <https://www.npr.org/2019/02/22/690544297/trump-administration-proposes-sweeping-changes-to-federal-family-planning-progra>; <https://www.hhs.gov/opa/title-x-family-planning/about-title-x-grants/statutes-and-regulations/index.html>.

<sup>275</sup> Victoria Colliver, *Anti-Abortion Clinics Caught in Tumult Over Trump Family Planning Rules*, *Politico*, May 3, 2019, available at <https://www.politico.com/story/2019/05/03/anti-abortion-clinics-family-planning-1402415>.

<sup>276</sup> Kate O'Hare, *Kathleen Eaton Bravo Changes Course for Pro-Life BirthChoice*, *CatholicVote*, Nov. 12, 2014, available at <https://www.catholicvote.org/kathleen-eaton-bravo-changes-course-for-pro-life-birthchoice/>.

Bravo talked about making the change from being pregnancy resource centers, giving out “Pampers and a prayer,” to full-service medical facilities.

And:

[Obria] adheres to the Catholic pro-life ethic and has a great deal of Catholic support.<sup>277</sup>

Ms. Bravo concluded her 2014 announcement by saying:

When we started this [i]t was “save the child in the womb.” As Christians, we believe in the sanctity of life, from conception to natural death. When I got into this, I wanted to make sure that every woman I came in contact with, would not make the same mistake I did.<sup>278</sup>

While Ms. Bravo has tried to rebrand Obria as a secular organization, the organization’s religious underpinnings have been prevalent throughout its public materials.<sup>279</sup> In many places, it refers to the organization as a ministry.<sup>280</sup> A biography for Ms. Bravo on an older version of Obria’s website states:

[T]he Catholic Community and California Bishops have also long recognized both Kathleen for her leadership in the pro-life movement and Birth Choice for their progressive medical model. Noting their support, Kathleen was named the 2011 Pro-Life Person of the Year by the Diocese of Orange.<sup>281</sup>

While it is clear Ms. Bravo’s faith pervades her work, Obria has also required its other staffers to maintain a similar dedication to Christian values. The 2011 job posting for Toby’s House included above stated explicitly that the organization would only accept Christian individuals to work in the shelter.<sup>282</sup> Toby’s House employed this religious screening despite having received a federal grant to operate the shelter.

Obria appears to have continued to employ this screening criteria in selecting candidates for jobs at its centers.<sup>283</sup> A 2017 posting for a President-Executive Director position on ChristianJobs.com includes this description of Obria’s mission statement:

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<sup>277</sup> *Id.*

<sup>278</sup> *Id.*

<sup>279</sup>

[https://web.archive.org/web/20150101035305/http://www.bchcdonor.org/literature\\_94743/Prolife\\_Medical\\_Model\\_Book](https://web.archive.org/web/20150101035305/http://www.bchcdonor.org/literature_94743/Prolife_Medical_Model_Book).

<sup>280</sup> <https://www.obria.org/wp-content/uploads/2016-Obria-Min-Report-FINAL-1pg-sm.pdf>;

<https://web.archive.org/web/20110812012439/http://www.birthchoiceoc.org/about/kathleens-story.html>.

<sup>281</sup> *Id.*

<sup>282</sup> [https://www.211oc.org/images/HPF/2011/hpf\\_2011-01-6\\_minutes\\_1259.pdf](https://www.211oc.org/images/HPF/2011/hpf_2011-01-6_minutes_1259.pdf).

<sup>283</sup> <https://www.christianjobs.com/job/231097/president-executive-director/obria-medical-clinics-of-southern-california/>.

Being led by God, we provide caring, high quality and comprehensive reproductive health services consistent with the inherent value of every person.<sup>284</sup>

A roundup of posts written by employees on the website for Obria Medical Clinics of Southern California reveals a similar religious guiding philosophy:

Our doctors, nurses, and staff simply follow Christ's example by loving her and serving her, regardless of her circumstances, so she feels supported no matter what choice she makes.

And:

Combining my medical profession with my pro-life beliefs at Obria So Cal was completely God driven.

And:

God has had His hand in this ministry. We've had our ups and downs but He always provides.<sup>285</sup>

Ms. Bravo praised the religious nature of the staff in 2016 saying, "Our nurses are young, strong Christians, who are pro-life and love what they do."<sup>286</sup> Beyond staff, Obria may also be screening patients for their religious beliefs. A patient intake form available on Obria's website asks patients to disclose their religious beliefs.<sup>287</sup>

Additionally, Obria may also be screening its affiliates for their religious beliefs. Obria's Affiliate Compatibility Evaluation asks potential affiliates:

How well aligned is your center's religious affiliation to Obria's?

- a. Is your center faith based?
- b. Is your center solely supported by one specific faith?  
(e.g., Catholic, Protestant, etc.)<sup>288</sup>

The next section of the application asks several faith-based questions that all seem to be angling for "yes" answers including:

Is the staff taught to provide a Christ-like approach to meeting the reproductive health needs of sexually active and at-risk clients?

And:

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<sup>284</sup> *Id.*

<sup>285</sup> <https://omcsocal.org/news>.

<sup>286</sup> Zoe Romanowsky, *Kathleen Eaton Bravo is on a Mission to Change the Pro-life Movement*, *Aleteia*, Nov. 14, 2016, available at <https://aleteia.org/2016/11/14/kathleen-eaton-bravo-is-on-a-mission-to-change-the-pro-life-movement/>.

<sup>287</sup> <https://www.obria.org/wp-content/uploads/2015/10/Obria-Patient-Intake-current-12-2014.pdf>.

<sup>288</sup> [https://obriagroup.org/wp-content/uploads/Affiliate\\_Compatibility\\_Evaluation\\_5-10-17.pdf](https://obriagroup.org/wp-content/uploads/Affiliate_Compatibility_Evaluation_5-10-17.pdf).

Is the staff taught that each patient and their situation is unique, and that they are there to serve the patient's immediate needs, presenting Christ to the patient at the right time, if the right time presents itself?<sup>289</sup>

Finally, the form includes one question that highlights Obria's focus on establishing facilities that mimic the look and feel of a legitimate healthcare clinic:

Does the clinic feel similar to a doctor's office or medical clinic?<sup>290</sup>

### **Conclusion**

Obria's transition from an organization adamantly opposed to government funding and hiring full time employees, to an organization structured and operated in pursuit of government funding to support its well-paid CEO reflects the larger metamorphosis of the anti-choice movement. Beyond limiting access to abortion, anti-choice advocates are also trying to divert government funds to their own bank accounts in order to decrease funding to women's health providers that deliver straightforward healthcare services to low-income women and children.

Obria's attempts to obtain Title X funding and weaken access to healthcare services is objectionable on its own, but Obria's own track record indicates that the organization has many problems beyond its misguided mission. Obria's history and Ms. Bravo's public statements indicate that the organization has repeatedly mislead its supporters and government officials about its intentions. Obria mislead Orange County about the use of tobacco settlement funding for abstinence education funding, and Obria appears ready to mislead HHS about the use of its Title X funding for contraception. It is time for Congress, federal officials, and the American public to stand up to deceptive organizations like Obria and prevent Ms. Bravo and her allies from depriving Americans of access to legitimate healthcare services.

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<sup>289</sup> *Id.*

<sup>290</sup> *Id.*